



PERSONAL DATA PROCESSING POLICY OF CASA CANDELA S.A.S. NIT: 901243034-1

CASA CANDELA S.A.S. NIT: 901243034-1 as responsible for personal data, recognizes the importance of the same and hereby complies with the Personal Data Protection Regime in Colombia, pledging to safeguard the privacy and security of the information provided to us, ensuring the protection of the rights to good name, Habeas Data, privacy, privacy, aligning all its actions according to the principles of legality, good faith, freedom, self-determination and transparency.

This policy has been structured subject to the Constitution and the Law, with the purpose of guaranteeing your rights, under standards of transparency, confidentiality and legality in the management of such information.

In view of the above, we recommend that you read this policy carefully.

1. CHAPTER ONE - GENERAL PROVISIONS



1.1. Identification of the Data Controller

CASA CANDELA S.A.S. NIT: 901243034-1, hereinafter **CASA CANDELA**, is a commercial company, domiciled at Calle 49 # 79 - 5, Medellin (Antioquia), email **novedadesdatospersonales@casacandela.co** and hereinafter will be understood as **THE CONTROLLER**.

As the party responsible for the Processing of Personal Data directly or indirectly related to **CASA CANDELA**, by means of this policy it complies with **Law 1581 of 2012**, **Decree 1377 of 2013** and other concordant regulations.

This policy is a public document that can be consulted at any time and will have updated data of the company responsible for data processing, to ensure their rights.

☎ +57 312 252 17 96 📧 casacandela.co

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán
www.casacandela.co



1.2. Scope

This policy enshrines the principles, rights, procedures, uses, purposes and limitations regarding the processing of personal information contained in all databases, physical and electronic files of the **RESPONSIBLE**, as well as the mechanisms that the holders of personal data have to exercise their rights to good name, Habeas Data, privacy, privacy, aligning all actions in accordance with the principles of legality, good faith, freedom, self-determination, transparency, confidentiality and legality in the management of such information.

1.3. Objective

This policy is structured according to legal parameters, recognizing the importance of the rights of data owners, in order to ensure the security, privacy, confidentiality of the same and establish the guidelines under which performs the processing of personal data of customers, suppliers, employees, contractors and, in general, of all persons in respect of whom personal data is collected, stored and managed, which are stored in databases, physical and electronic files, managed by **THE RESPONSIBLE**.

1.4. Definitions

1.4.1. Data Protection Authority: In Colombia, the **Superintendence of Industry and Commerce –SIC–** through the **Delegation for the Protection of Personal Data**, is the entity that exercises surveillance in order to guarantee the rights, principles and procedures in the processing of personal data carried out by legal or natural persons.

1.4.2. Authorization: Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.

1.4.3. Authorized: Refers to all those persons who, under the responsibility of **CASA CANDELA**, its Agents or business partners may carry out Personal Data Processing by virtue of the Authorization granted by the Data Subject.

1.4.4. Privacy Notice: Verbal or written communication generated by the responsible party, addressed to the Data Subject for the Processing of personal data, by which it informs the existence of the Information Processing Policies that will be applicable, how to access them and the purposes of the Processing of personal data.



1.4.5. Database: Organized set of personal data that is subject to Processing. The Law exempts from the protection regime (i) files and databases belonging to the personal or domestic sphere; (ii) those whose purpose is national security and defense, prevention, detection, monitoring and control of money laundering and financing of terrorism, (iii) those whose purpose is and contain intelligence and counterintelligence information, (iv) journalistic information and other editorial content, (v) those regulated by Law 1266 of 2008 (financial and credit information, commercial, services and from third countries) and (vi) those regulated by Law 79 of 1993 (on population and housing censuses).

1.4.6. Unequivocal Conduct: Corresponds to the clear behavior of the holder, or of a legitimate person that cannot give rise to any doubt or mistake in the consent or authorization of the processing of his/her personal data.

1.4.7. Consent: It is any manifestation of will, free, specific, informed and explicit, in which the data subject accepts, either by means of a statement or a clear affirmative action, the processing of personal data concerning him/her. These "clear affirmative actions" of the proposed regulation are the unambiguous conduct in question.

1.4.8. Personal data: This refers to any information linked or that may be associated to one or several determined or determinable natural persons, such as name, age, sex, marital status, domicile, among others. This data may be stored in any physical or electronic medium and may be processed manually or automatically.

1.4.9. Private Data: Data that, due to its intimate or reserved nature, is only relevant to the Data Owner.

1.4.10. Public data: Data that is not semi-private, private or sensitive. Public data includes, among others, data related to the marital status of individuals, their profession or trade, and their status as merchants or public servants. By their nature, public data may be contained, among others, in public records, public documents, gazettes, official bulletins and duly executed court rulings that are not subject to confidentiality.

1.4.11. Semi-private 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 to society in general, such as financial and credit data on commercial activity or services referred to in Title IV of Law 1266 of 2008.



1.4.12. Sensitive Data: Data that affect the privacy of the Data Subject or whose improper use may generate discrimination, such as data that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sex life and biometric data.

1.4.13. Data Processor: Natural or legal person, public or private, who by himself or in association with others, carries out the Processing of personal data on behalf of the Data Controller.

1.4.14. Habeas Data: The constitutional right of all persons to know, update and rectify the information collected about them in data banks, and the other rights, freedoms and constitutional guarantees related to the collection, processing and circulation of personal data.

1.4.15. Data Controller: Natural or legal, public or private person who by himself or in association with others, decides on the database and/or the processing thereof.

1.4.16. Data Subject: Natural person whose personal data are subject to Processing. The Data Subject is subject to the right of habeas data and other legal and constitutional rights and guarantees.

1.4.17. Transfer: Means when the controller or the person in charge of the Processing of personal data, located in Colombia, sends the information or personal data to a recipient, who becomes responsible for the Processing and is located inside or outside the country.

1.4.18. Transmission: Implies the communication of personal data, within or outside the territory of the Republic of Colombia, for the purpose of Processing by the Processor and in accordance with the instructions of the Controller.

1.4.19. Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

1.5. Legislation that regulates the matter and the Processing that we perform as RESPONSIBLE

- Political Constitution of Colombia of 1991, articles 15 and 20.
- Law 1266 of 2008.
- Law 1581 of 2012.
- Decree 1377 of 2013.

+57 312 252 17 96 @ casacandela.co

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán
www.casacandela.co



- Sole Decree 1074 of 2015.
- Decree 090 of 2018.
- Constitutional Court Rulings C - 1011 of 2008, and C - 748 of 2011.
- Circular 003 of 2018, issued by the Superintendence of Industry and Commerce.
- Guides and Primers issued by the Superintendence of Industry and Commerce.

2. CHAPTER TWO- PRINCIPLES



CASA CANDELA welcomes and abides by the principles that regulate the matter, being the basic parameters to be followed in the collection, handling, use, processing, storage, deletion, transmission or transfer of personal data which are governed by the following:

2.1. Principle of legality: The Data Processing will be subject at all times to the current legislation; in particular, to the provisions of the Constitution, Law 1581 of 2012, Decree 1377 of 2013 and other rules governing the matter.

2.2. Principle of Freedom: The Processing of Personal Data may only be carried out with the prior, informed and express authorization of the owner. In accordance with the right to information and the above described, the holder will always be informed about the purpose of the processing of their personal information, which will always be described herein for consultation at any time. Personal data may not be obtained or disclosed without the prior, express and informed consent of the holder or by legal or judicial mandate that relieves the consent.

2.3. Principle of purpose: The Processing must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Holder in advance, clearly and sufficiently.

2.4. Principle of truthfulness or quality: The information subject to Processing must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.

2.5. Principle of transparency: The right of the Data Subject to obtain from the Data Controller or the Data Processor, at any time and without restrictions, information about the existence of data concerning him/her, must be guaranteed in the Processing.



2.6. Principle of restricted access and circulation: Processing is subject to the limits derived from the nature of the personal data, the provisions of Law 1581 of 2012, the Constitution and others that regulate the matter. In this sense, the Processing may only be carried out by persons authorized by the Holder and/or by the persons provided for in the aforementioned regulations. Personal data, except for public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the Data Controller or authorized third parties in accordance with this law;

By virtue of the foregoing, access to Personal Data shall only be allowed to the following persons:

- The Data Controller.
- To the persons authorized by the Data Controller.
- To persons who by legal mandate or court order are authorized to know the information of the Data Subject.
- By personnel authorized by **THE CONTROLLER** of this policy who, due to their position, functions or by virtue of the ordinary course of business or the corporate purpose of the company, must know them, always ensuring the custody, confidentiality and security of the personal data.

2.7. Principle of security: The information subject to Processing by the Data Controller or Data Processor shall be handled with the technical, human and administrative measures necessary to ensure the security of the records, avoiding their adulteration, loss, consultation, unauthorized or fraudulent use or access;

2.8. 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 it corresponds to the development of the activities authorized by law.

2.9. Principle of Collection Limitation: The processing of personal data shall be limited to the collection, storage, use and processing that is strictly necessary according to the nature of the personal data, legal provisions and the Political Constitution. In this sense, the recording and disclosure of data that are not closely related to the purpose of the processing is prohibited.



2.10. Principle of Temporality: Personal Data will be kept only for the reasonable and necessary time to fulfill the purpose of the Processing and the legal requirements or instructions of the supervisory and control authorities or other competent authorities. The data will be kept when it is necessary to comply with a legal or contractual obligation. To determine the term of the processing, the rules applicable to each purpose and the administrative, accounting, fiscal, legal and historical aspects of the information will be considered.

3. CHAPTER THREE - TARGET AUDIENCES FOR THIS POLICY



3.1. Consumer or End Customer

3.2. Suppliers and Corporate Customers

3.3. Employees

3.4. Contractors

3.5. Information Processors.

3.6. Owners of the information, either acting on their behalf, or as legal representative, who on the occasion of the activities that are linked to THE RESPONSIBLE, their personal information is required for the development of the same.

4. CHAPTER FOUR - PROCESSING OF PERSONAL DATA



Law 1581 of 2012 defined the processing of personal data in the following terms:

"Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion."

☎ +57 312 252 17 96 📧 [casacandela.co](https://www.casacandela.co)

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán
www.casacandela.co



This policy is structured according to legal parameters, recognizing the importance of the rights of data owners, in order to ensure the security, privacy, confidentiality of the same and establish the guidelines under which performs the processing of personal data of customers, suppliers, employees, contractors and, in general, of all persons in respect of whom personal data is collected, stored and managed, which are stored in databases, physical and electronic files, managed by **THE RESPONSIBLE**.

In this order, **CASA CANDELA S.A.S. NIT: 901243034-1** collects personal data of public, semi-private, private and sensitive nature, namely, some are:

4.1. Type of Personal Data:

4.1.1. Identification Data: First name(s), last name(s), type of identification, identification number, etc.

4.1.2. Location data: Address, city, telephone, and e-mail address.

4.1.3. Biometric data of the person: Fingerprint, iris, facial or body geometry, video photography. Marital status, sexual or gender orientation.

4.1.4. Sensitive data: Health status of the person (employee) including results of tests, laboratories, studies, medical diagnoses, clinical, psychological, psychiatric histories, medications and therapeutic treatments.

4.1.5. Financial and credit data from commercial or service activities.

4.1.6. Datos socioeconómicos: Relacionados con la historia laboral, experiencia laboral, cargo, fechas de ingreso y retiro, anotaciones, llamados de atención, etc.

4.1.7. Datos relacionados con afiliación y aportes al sistema integral de seguridad social: EPS; IPS; ARL, fechas ingreso/retiro EPS, AFP, etc.

4.1.8. Datos personales de acceso a sistemas de información: Usuarios, IP, claves, perfiles, etc.



4.2. Processing to which the personal data is submitted

4.2.1. Recolection.

The information is obtained with the prior, express and informed authorization of the owner of the personal data directly or through third parties that have this authorization from the owner of the data.

CASA CANDELA S.A.S. NIT: 901243034-1 – Collects personal data through different activities related to its corporate purpose, physical and digital communication channels, as well as those obtained by virtue of its position as distributor, employer and contractor. Namely, some of them are:

4.2.1.1. Website.

4.2.1.2. **Applications:** Social networks and platforms.

4.2.1.3. Through e-mail.

4.2.1.4. Points of sale.

4.2.1.5. Telephone registration.

4.2.1.6. Physical and digital forms and/or formats.

4.2.1.7. Resumes.

4.2.1.8. Employment contracts

4.2.1.9. Civil and commercial contracts.

4.2.1.10. Registration forms for suppliers – contractors.

4.2.1.11. Identification documents.

4.2.1.12. Authorization forms for the processing of personal or sensitive data.

4.2.1.13. Image use authorization forms.



4.2.1.14. Audio, video or photographic recordings

4.2.1.15. Cookies.

4.2.3. Storage

CASA CANDELA stores the Personal Data collected by digital or electronic means in databases contained in its servers. The physical files are located in the general file of the company. All storage media described above have physical, technical and administrative security measures that guarantee the principle of access, confidentiality and restricted circulation.

4.2.4. Uses and Purposes of the Collection of Information

In accordance with the legal postulates and the right to information of the holders of personal data, the use and purpose of the personal information collected and processed is described below.

4.2.4.1. Effective communication with the owners of the personal data.

4.2.4.2. Attention to the citizen/customer (P.Q.R.S. Management).

4.2.4.3. Product sales management.

4.2.4.4. Follow-up of orders placed by the customer.

4.2.4.5. Marketing and sales.

4.2.4.6. Marketing.

4.2.4.7. Advertising.

4.2.4.8. Management and preparation of internal and external statistics.

4.2.4.9. Loyalty programs and strategies.

4.2.4.10. Profiling (knowledge of tastes and consumption habits and balances).

4.2.4.11. Execution of obligations undertaken by the parties under the policies, internal company regulations and manuals.

☎ +57 312 252 17 96 📧 [casacandela.co](https://www.casacandela.co)

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán
www.casacandela.co



4.2.4.12. Exercise of a right.

4.2.4.13. Hiring and training of personnel.

4.2.4.14. Conclusion and execution of civil and/or commercial contracts.

4.2.4.15. Registration of documents.

4.2.4.16. Administrative procedures.

4.2.4.17. Publications.

4.2.4.18. Accounting, tax, administrative and legal management.

4.2.4.19. Payroll and personnel management.

4.2.4.20. Campaigns for updating data and information on changes in the processing of personal data.

4.2.4.21. Custody and management of information.

4.2.4.22. Storage, custody and management of databases.

4.2.4.23. Dispatch of communications.

4.2.4.24. Human resources management, payroll, management of labor issues.

4.2.4.25. Recordings through video surveillance systems, in accordance with the provisions hereof.

4.2.4.26. Cookies of **CASA CANDELA**'s website.

4.2.4.27. Create and disseminate through media such as broadcasting organizations, streaming platform, social networks, digital platforms that allow the availability of advertising, printed formats such as flyers, posters, exhibitions, fairs, among others, photographic, audio and audiovisual pieces containing biometric data of the holder.

4.2.4.28. Transmit or transfer to third party allies, through a process of transmission or transfer of information, only information of a public, semi-private and private nature. For purposes consistent with the development of the corporate purpose of the company.

☎ +57 312 252 17 96 📧 [casacandela.co](https://www.casacandela.co)

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán

www.casacandela.co



4.2.5. Circulation

Casa Candela S.A.S. NIT: 901243034-1, as responsible for personal data, recognizes the importance of the same, its security, confidentiality and purpose. Likewise, its actions are circumscribed in the treatment of data to the principles outlined in the present and in the Law. In that order, in this point, in particular, we are subject to the provisions of the **principle of restricted access and circulation**:

The Processing is subject to the limits derived from the nature of the personal data, the provisions of Law 1581 of 2012, the Constitution and others that regulate the matter. In this sense, the Processing may only be carried out by persons authorized by the Holder and/or by the persons provided for in the aforementioned regulations.

By virtue of the foregoing, only the following persons shall be allowed access to the Personal Data:

- The Data Subject.
- To persons authorized by the Data Controller.
- To persons who by legal mandate or court order are authorized to know the information of the Data Subject.
- By personnel authorized by **THE CONTROLLER** of this policy who, by virtue of their position, functions or by virtue of the ordinary course of business or the corporate purpose of the company, must know them, always ensuring the custody, confidentiality and security of personal data.

In development of the above, subject to the **principle of restricted access and circulation** described herein, **CASA CANDELA S.A.S. NIT: 901243034-1**, may transfer or transmit the public, semi-private and private personal information, which is shared, provided that these actions are justified and have the prior and express authorization of the owner obtained at the time of collecting the information or prior to the transmission or transfer, if it has not had it before.

Likewise, these actions shall be preceded by a contract for the transmission or transfer of personal data, guaranteeing the restricted circulation of the information, confidentiality and, in general, the security and integrity of the same, in order to prevent fraudulent or unauthorized use of the databases and personal information.



4.2.6. Suppression

The suppression of personal information is done once the purpose for which the data was collected has been fulfilled, as long as the owner of the data wants to suppress it, otherwise it may be kept, except in cases in which the owner of the personal data requests the elimination of the information, this case will proceed, as long as the law authorizes it.

5. CHAPTER FIVE - RIGHTS OF THE HOLDERS OF PERSONAL DATA



CASA CANDELA S.A.S. NIT: 901243034-1, in its capacity as responsible for Data Processing, is respectful and guarantor of the rights of the holders of personal data.

The Fundamental Right of Habeas Data, empowers the owner of the data to request access, update, rectification and deletion of their personal data stored in databases or physical or digital files. In the same order, the owner has the power to revoke the authorization granted for the processing of such data.

5.1. In accordance with the above, we inform you of the RIGHTS that you have:

5.1.1. Right to know and consult your personal data.

5.1.2. Right to update your personal data in case of being fractioned, incomplete, among others.

5.1.3. The right to rectify and/or correct your personal data in case they are erroneous, partial or misleading.

5.1.4. The right to request the deletion of your personal data from the company's databases. The exercise of this right will always be respected, warning that the information that the Law orders will continue to be kept, for the purposes provided therein.

5.1.5. The right to request at any time proof of the authorization granted to the RESPONSIBLE, for



the processing of your personal data, except when expressly exempted by law.

5.1.6. Right to revoke the authorization for the processing of personal data, provided that this does not generate non-compliance by the RESPONSIBLE with other legal obligations regarding the permanence of the data.

5.1.7. Right to be informed by THE RESPONSIBLE, upon request, regarding the use it has made of its personal data.

5.1.8. Refrain from answering questions about sensitive data.

5.1.9. Right to file petitions, complaints, suggestions or appeals, regarding the processing of personal data, before **CASA CANDELA S.A.S. NIT: 901243034-1**. You may also file them before the Superintendence of Industry and Commerce in accordance with the provisions of the aforementioned Law and other regulations that modify, add or complement it.

5.1.10. Right to know by email, message via WhatsApp or other applications or means of communication used by THE RESPONSIBLE, the Personal Data Processing Policy.

5.2. Mechanisms for exercising your RIGHTS:

5.2.1. Petition, Appeals, Claims and Consultations

You may submit: petitions, appeals, claims, and queries to the following e-mail address: novedadesdatospersonales@casacandela.com, during our business hours: Monday through Friday from 8:00 a.m. to 12:00 p.m. and from 1:00 p.m. to 5:00 p.m.

The same, will be resolved within a maximum period of fifteen (15) working days from the day following the date of receipt of the same and the filling of the necessary data for the response, namely: name, type of identification document, identification number, telephone, address, email, the fact that supports the same and all the information necessary to process your request, including documents, if applicable. Remember that you must be the owner of the requested information or, have power of attorney to represent the owner, duly accredited, always justifying the need and which must be attached with a copy of your identity card and / or professional card.

The above is subject to the limits of the rights over personal data of third parties that may be violated; that is to say, THE RESPONSIBLE will verify that it does not affect the right to privacy and other fundamental rights of third parties, different from the owner of the information.

☎ +57 312 252 17 96 📷 casacandela.co

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán
www.casacandela.co



CASA CANDELA is committed to the protection, security and confidentiality of your personal data, according to the scope, parameters, conditions, principles, rights and obligations regarding the treatment of the same, described in this policy, always available for consultation.

Please note that the email described above is the only channel enabled for requests, appeals, complaints, inquiries and suggestions.

6. CHAPTER SIX - DUTIES AND OBLIGATIONS OF THE DATA CONTROLLER AND THE DATA PROCESSORS



6.1. With respect to the Data Subject:

6.1.1. To guarantee the full exercise of the rights mentioned herein.

6.1.2. To request and keep a copy of the authorization granted by the Data Subject.

6.1.3. To clearly and sufficiently inform the Data Subject of the rights granted by virtue of the authorization granted.

6.1.4. Inform in a clear and sufficient manner about the purpose and use given to the Personal Data.

6.1.5. To observe the principles of truthfulness, quality, security and confidentiality of the Personal Data, in accordance with this policy.

6.1.6. To keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.

6.1.7. Update, rectify or delete the Personal Data when appropriate.

6.2. Regarding Processing through a Processor:

6.2.1. To provide only Personal Data whose processing is previously authorized and within the limits granted therein.

☎ +57 312 252 17 96 📧 casacandela.co

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán

www.casacandela.co



6.2.2. Guarantee that the information provided is complete, accurate, updated, understandable, verifiable and truthful.

6.2.3. Communicate in a timely manner all developments with respect to the data previously provided and take other necessary measures to keep the information provided to it updated.

6.2.4. To inform in a timely manner about the rectifications made by the owner, so that the Data Controller makes the appropriate adjustments.

6.2.5. To require the Data Processor at all times to respect the security and privacy conditions of the data subject's information.

6.2.6. Inform when certain information is under discussion by the Data Controller, as well as the resolution of the same, in case it affects the treatment.

6.3. With respect to the Superintendence of Industry and Commerce:

6.3.1. To inform when risks arise in the processing of personal data.

6.3.2. To comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

6.4. Regarding the Video Surveillance Systems:

CASA CANDELA has different video surveillance systems both in its premises, kitchen, offices and premises, as well as in external sites, for the safety of people, property and the improvement of service and good business practices.

In accordance with the above and, in compliance with the regulations governing the matter, always inform the public about the existence of these systems through visible announcements, indicating the purpose of the collection and processing of personal data, as described herein.

As **RESPONSIBLE** for the processing of personal data, we warn that videos or photographs obtained by these systems will not be given to any third party, unless there is a court order or a competent authority or the law so orders.



7. CHAPTER SEVEN - PARAMETERS WITH RESPECT TO THE AUTHORIZATION OF THE PROCESSING OF PERSONAL DATA



CASA CANDELA S.A.S. NIT: 901243034-1, will only process Personal Data with the prior, express and duly informed authorization of the Holder of the personal data. The authorization will not be necessary in the exceptions provided by law.

In that order, we have suitable mechanisms that allow us to verify that authorization, which will be recorded in any medium, whether a physical document, electronic, data message, internet, websites or in any format that guarantees its subsequent consultation through technical tools, complying with the requirements established by law, subject to the rights held by the holder.

Consequently, through this policy we inform the holder of personal data the following parameters prior to the granting of authorization, which will always be informed through the various means and mechanisms through which it is obtained.

Please note:

- 7.1. You will always be informed about the processing of personal data.
- 7.2. The purpose of the processing of personal data, outlined in this policy, will be informed.
- 7.3. With respect to sensitive data, it is optional for the holder to answer questions in this order. In this case, the holder will always be informed in advance about the sensitive nature of the personal data being collected, for his knowledge, as well as the purpose of the same.
- 7.4. The rights to which the Data Subject is entitled.
- 7.5. The treatment will only be done with the prior, informed and express authorization of the holder, which will be obtained through the mechanisms described in this policy, subject to the provisions herein.
- 7.6. In case there are substantial changes on the identification of the responsible or the purpose of the processing of personal data, we will immediately inform the holder of the personal data for the authorization of the same, according to the new guidelines.



8. CHAPTER EIGHT - DATA TRANSFER AND TRANSMISSION



8.1. Data transfer:

It takes place when the Data Controller and/or Data Processor, in accordance with the provisions herein, sends the information or personal data to a recipient, which in turn is the Data Controller and is located inside or outside the country.

The transfer of personal data is allowed as long as the Data Subject has authorized the transfer by any of the means and in accordance with the provisions herein. In any case, the Receiver of the information must guarantee the security of the information and adequate levels of data protection.

8.2. Regarding limits on the transfer of personal data to other countries:

The transfer of personal data of any kind to countries that do not provide adequate levels of data protection is prohibited. It is understood that a country offers an adequate level of data protection when it complies with the standards set by the Superintendence of Industry and Commerce on the matter.

The prohibition does not apply when:

8.2.1. Information with respect to which the holder has given express and unequivocal authorization for the transfer.

8.2.2. Exchange of medical data, when so required by the treatment of the holder for reasons of health or public hygiene.

8.2.3. Transfers agreed within the framework of international treaties to which the Republic of Colombia is a party, based on the principle of reciprocity.

8.2.4. Transfers necessary for the execution of a contract between the data controller and the data



subject, or for the execution of pre-contractual measures, as long as the data subject's authorization is obtained.

8.2.5. Transfers legally required for the safeguarding of public interest, or for the recognition, exercise or defense of a right in a judicial process, as well as other cases determined by the Law, the Superintendence of Industry and Commerce or the competent authority.

9. CHAPTER NINE - PROTECTION MEASURES IMPLEMENTED FOR THE SECURITY OF PERSONAL DATA



CASA CANDELA has adopted technical, legal, human and administrative measures necessary to ensure the security of personal data protecting the confidentiality, integrity, use, unauthorized and/or fraudulent access.

Likewise, internally we have implemented security protocols of mandatory compliance for all staff with access to personal data and information systems, in order to prevent tampering, loss, consultation, use or unauthorized or fraudulent access to personal data.

10. CHAPTER TEN - BINDING NATURE OF THIS POLICY



Any holder of the information that has any relationship with **CASA CANDELA**, must abide by this policy. In case of not accepting it, when it comes to entering the facilities, **CASA CANDELA** reserves the right to enter them, due to the impossibility of processing their personal data.

This Personal Data Treatment Policy is effective as of **January 1, 2024.**

☎ +57 312 252 17 96 📧 [casacandela.co](https://www.casacandela.co)

Veredea Taferanes Ruta 429180 | Entre San Jerónimo y Sopetrán

www.casacandela.co