

## **Coally's data processing policy:**

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### **1. Presentation**

COALLY S.A.S is a Colombian company whose main activity is connecting companies and/or individuals with young recent graduate students through a virtual platform (webpage and mobile app) by understanding clients' needs and giving them recruiting support and consultancy.

COALLY S.A.S in order to obey the data privacy law, under legislation n. 1582/2012 and decree n. 1074/2015 and further modifications, ratifications, and complements present the DATA PRIVACY POLICY FOR THE PROTECTION AND TREATMENT OF PRIVATE DATA (from now on "data processing policy") to protect all shared data disclosed with Coally S.A.S. by clients, consulting, or any other company or individual that have a relationship with Coally to be after collected, treated and processed by Coally S.A.S. and third parties connected with the project.

The objective of this data processing policy is to protect the constitutional right of Habeas Data that provides all companies and individuals the right to know, update and ratify data provided to Coally S.A.S. and gives the data protection right; Coally S.A.S. only collects and uses private data when authorized by the owner by applying confidential and privacy treatment of all data.

### **2. Scope of application**

These terms and conditions and all matters related to privacy data use by Coally S.A.S is under Colombian law, especially 1582/2012 and decree n. 1074/2015.

### **3. Definitions**

A. Owner: individuals whose data is processed. For this personal data processing policy, the holders may be: (i) Clients of the platform; (ii) Consultants and people not directly related to COALLY S.A.S. whose personal data is processed;

B. Client: individuals and companies;

C. User: any person who has used the platform, either as a client or as a consultant;

D. Platform: the data collection by Coally S.A.S will be through the Coally App and Coally Web platforms used for the development of the activity of this company.

E. Personal data: any information linked or that can be associated with one or several determined or determinable individuals;

F. Database: set of data that is subject to treatment;

G. Personal database: a set of personal data that is processed by an individual or company;

H. Sensitive data: all personal data that affects the owner's privacy and whose incorrect use could generate discrimination. Sensitive data, among others, are considered health data, data on sexual orientation, racial and ethnic origin, political opinions, and religious, philosophical, or moral convictions;

I. Private data: intimate or reserved personal data that is relevant to the holder;

J. Semi-private Data: personal data related to interest for the owner and a specific sector of people or society, so it is not intimate but reserved for a specific group.

K. Public data: personal data classified as such according to the Constitution and the law and that has not been classified as private or semi-private personal data.

L. Habeas data: owner's right of the personal data shared to ask from the administrators the access, inclusion, exclusion, correction, addition, update, and rectification of the data, as well as the limitation in its disclosure, publication, or assignment.

M. Authorization: prior, express, and informed consent of the owner to process personal data.

N. Privacy Notice: verbal or written communication addressed to the owners about the personal data that are being processed by the company, in which they are informed about the existence of the personal data processing policies that will be applied to them, the way of access them, and the purposes for which your personal data will be used.

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

P. Responsible for the treatment: individuals or public or private companies that, by themselves or in association with others, decide on the processing of personal data. In this case, it will be COALLY S.A.S., the data controller.

#### **4. Guiding principles for processing personal data**

As established in Title II of Statutory Law 1581/2012, the protection of personal data will be governed by the harmonious and comprehensive application of the following principles:

A. Principle of legality in the processing of personal data: the processing of personal data referred to in Statutory Law 1581/2012 is a regulated activity that must be subject to what is established by law (current and future dispositions);

B. Principle of purpose: the processing of personal data must obey a legitimate purpose under the Constitution and the law, which must be informed to the holder;

C. Principle of freedom: the processing of personal data can only be exercised with the prior, express, and informed consent of the holder. Personal data may not be obtained or disclosed without prior authorization or a legal or judicial mandate that relieves consent.

D. Principle of veracity or quality: the information subject to treatment must be accurate, complete, exact, updated, verifiable, and understandable. The Processing of partial, incomplete, fractional, or misleading data is prohibited.

E. Principle of transparency: in the processing of personal data, the holder has the right to obtain from the data controller or the data processor, at any time and without restrictions, information about their data.

F. Security principle: the information subject to treatment by the Treatment Manager or Treatment Manager, according to the Statutory Law 1581/2012, must be handled with the technical, human, and administrative measures that are necessary to grant security to the records avoiding its adulteration, loss, consultation, use or unauthorized or fraudulent access.

G. Principle of confidentiality: all people involved in the processing of personal data that are not public are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks that comprise the treatment, and may only provide or communicate personal data when it corresponds to the development of the activities authorized in Statutory Law 1581/2012 and its terms.

H. Principle of access and restricted circulation: the treatment is subject to the limits that derive from the nature of the personal data, the provisions of Statutory Law 1581/2012, and the Constitution. In this sense, the treatment can only be done by authorized people by the owner and/or by the list of people according to the law.

#### **5. Authorization for the processing of personal data and cases in which authorization is not required**

The consent and authorization by the holder of the information is a constitutional and legal requirement that must be complied with by the responsible agents to process personal data. The consent must comply with the following assumptions:

**Prior:** the authorization must be given by the Information holder before any Personal Data Processing.

**Express:** the authorization must be granted in a particular, clear, and specific way.

**Informed:** the owner must clearly understand what their personal data will be processed for and the treatment purposes.

All visitors to the Platforms of COALLY S.A.S. must register and authorize the processing of personal data to use the services offered. Therefore, in each of the systems, there is a box that says "Privacy Policy and Treatment of Personal Data," which must be read and accepted to continue using the services of COALLY S.A.S.

## **6. Types of data collected by COALLY S.A.S**

Coally S.A.S will collect data provided by Coally users, such as those generated during the creation of accounts or provided in the use of the services.

A. User Profile: data generated when accounts are created or updated. This may include name, email, phone number, username, password, identification document, and profile photos.

B. Demographic Data: User demographic data such as an address, age, gender, place of residence, career, and areas of interest will be collected. It can also be collected through the surveys designed for it.

C. Usage Data: Data about the service provided or service requested is collected, this includes the type of service requested or provided, details of the service, information about when the service was provided, and the frequency of request or provision of the service.

D. Other data: customer comments, ratings, and opinions of the service provided.

## **7. Purpose of personal data processing**

The Personal Data collected by Coally S.A.S. are included in a Database to which only authorized personnel of COALLY S.A.S. access in the exercise of their functions, noting that in no case is the Processing of information authorized for purposes other than those described here and that they are communicated to the Holder directly at the latest at the time of collection.

The primary purpose of the collection, storage, use, and/or circulation of personal data collected by Coally S.A.S is to provide the services offered adequately and to achieve compliance with the expectations of the users of the web and mobile platform.

Additionally, to develop the company's corporate objectives, Coally S.A.S may process data for the following purposes:

Purposes of the processing of personal data of Users:

1. Collect the users' data and incorporate and store them in the database of Coally S.A.S.

2. Order, catalog, classify, divide or separate the information provided.
3. Use the data provided in communication, dissemination, and promotion campaigns or offers of products, activities, and/or services developed as part of the company's internal strategies.
4. Keep records of the company and maintain contact with data owners.
5. Verify or validate the data provided.
6. Transfer personal data to any country or server in another country.
7. Share and transfer personal data to partners and the partners of our partners.
8. Communicate and allow access to personal data provided to third-party providers of general support services and to natural or legal persons who are shareholders of COALLY S.A.S.
9. Carry out, under the law, reports risking centers for breach of financial obligations derived from the commercial relationship.
10. Sending communications through any channel including, but not limited to, social networks, text messages, push notifications, email, phone calls, etc., related to the corporate purpose of COALLY S.A.S., such as marketing activities and/or any request made by the owner to COALLY S.A.S., among others.
11. Provide the services offered and/or contracted adequately and with excellent quality.
12. Recommend, according to the information provided by the consultant, specific projects that respond to your tastes, preferences, or needs.

## **8. Applicable regulations**

The treatment of the Personal Data of the owner will be carried out based on what is established in this privacy policy and what is stipulated in Law 1581/2012, Decree 1377/2013, Decree 886/2014, regulations compiled in Decree 1074/2015 of the Republic of Colombia, and the other regulations that they add or modify.

## **9. Rights of the holders**

In compliance with the fundamental guarantees provided in the Constitution and the law, and without prejudice to the provisions of the other regulations that regulate the matter, the holders of personal data may exercise the following rights free of charge and without limitation:

- a. Right to access your personal information subject to treatment;
- b. Right to update personal data subject to processing;
- c. Right to rectify personal data subject to processing;
- d. Right to oppose personal data being processed;
- e. Right to request the deletion of personal data when the principles, rights, and constitutional and legal guarantees are not respected in the treatment;
- f. Right to request proof of the authorization granted for treatment;
- g. Right to revoke consent for the processing of personal data;
- h. Right to present complaints and claims before the Superintendence of Industry and Commerce for violations of the provisions of Statutory Law 1581/2012 and other regulations that modify, add or complement it;

i. Right to be informed by the Responsible and/or Manager of the use and treatment that will be given to personal data, as well as of the modifications and updates of the protection policies, security measures, and purposes.

#### **10. Identification of the person in charge and/or in charge of the treatment:**

Coally S.A.S is responsible for the processing of your personal data and will use it only for the purposes for which it is empowered. Especially those indicated in this policy.

Coally S.A.S

NIT: 901. 420 57 4 - 6

Address: 19 #4 56 Street, apartment 1403.

Website: [www.coally.com](http://www.coally.com)

Email: [coaly3@gmail.com](mailto:coaly3@gmail.com)

Telephone: 316 359 05 61

#### **11. Duties of the person responsible for personal data.**

In line with current regulations on data processing, Coally S.A.S must comply with the following duties:

- a. Guarantee the holder, at all times, the whole and effective exercise of the right of habeas data;
- b. Request and keep the reservation and authorization granted by the owner;
- c. Inform the owner about the purpose of data collection and the rights that assist him under the authorization granted;
- d. Keep the information under the necessary security conditions to prevent adulteration, loss, or unauthorized access;
- e. Update the information and adopt the necessary measures so that the information provided is kept up to date.

#### **12. Queries and claims**

Queries, complaints, or claims may be submitted through a data message addressed to the email [andresjoya@coally.com](mailto:andresjoya@coally.com):

##### **Inquiries**

In the case of the right to request information and/or queries, Coally S.A.S. will respond within a maximum term of ten (10) business days from the day following the date of receipt of the request or query.

When it is not possible to attend to the query within said term, the interested party will be informed, indicating the reasons for the delay and indicating the date on which it will be attended, which in no case may exceed five (5) business days following the expiration of the first finished. The consultation document must contain the following:

1. Area of Coally S.A.S to which it is directed (Customer Service)

2. The name and identification number of the Owner.
3. Copy of the identity document of the owner

### **Complaints and/or claims**

When the Holder considers that their information should be corrected, updated, or deleted or when they notice an alleged breach of any of their rights, the maximum term to address the complaint or claim will be fifteen (15) business days from the date following the date of receipt of the document.

When it is not possible to attend to the claim within said term, the interested party will be informed of the reasons for the delay and the date on which it will be attended, which in no case may exceed eight (8) business days following the expiration of the first term. If the claim is incomplete, the interested party will be required to do within five (5) days following receipt of the complaint and/or claim to correct the failures. After two (2) months from the date of the request, without the applicant submitting the required information, the complaint or claim will be deemed to have been withdrawn.

The complaint or claim document must contain the following:

1. Area of Coally S.A.S to which it is addressed (Customer Service)
2. The name and identification number of the Owner.
3. Copy of the identity document of the owner.

### **13. Modifications**

We may update this Data Policy from time to time. In case of changes, users will be notified through the application or the website. Therefore, accepting the use of the services after the notice of an update constitutes the user's consent to update's content.

### **14. Validity**

This Policy enters into force as of January 1, 2021.

The Personal Data stored, used, or transmitted will remain in the Coally S.A.S databases for as long as it is necessary to comply with the purposes outlined in this manual or for the Company to comply with its legal duties.

However, the information will be reviewed every year to verify the integrity of the data and the purpose of continuing with its treatment. If necessary, Coally S.A.S reserves the right to modify this Policy unilaterally; Notwithstanding this, in the event of any substantial change to the Policy, it will be communicated to the holders.