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DATA TREATMENT AND PROTECTION POLICY

Version 40

In compliance with the statutory law 1581 of 2012 and the decree 1377 of 2013, which regulate the treatment of personal data information contained in databases. Intramar Shipping S.A.S. establishes the Data Treatment and Protection Policy for the protection of personal data, which regulates the collection, storage, management and protection of information that is received from clients, employees, providers and other people, called Owners of the information.

The legal person responsible for the processing of personal data and the database in which they are located, is Intramar Shipping S.A.S, with its main address in the city of Bogotá, Colombia.

- Diagonal 47 No.77B-09 Interior 5.
- NIT. 860.001.265 1
- Email: intramar@intramar.com.co
- PBX: (57 + 1) 746 67 75
- Website: www.intramar.com.co

Treatment and purpose of personal data

Intramar Shipping S.A.S, uses the personal information that the Owners provide for administration purposes, to develop its services, and to prepare statistics, among others related to the business activities of the organization.

Intramar Shipping S.A.S, commits to not collect unnecessary information and to maintain the confidentiality and security of it. The processing of the data will be assigned to specific employees of the departments in charge of the databases.

The data will be kept safe indefinitely in digital format, and physical information during the time required by the operation, and for five (5) more years by law.

Rights of the Owners

According to the eighth article of the law 1581 of 2012, the Owners of the information have the following rights:

To know, update and rectify their personal data upon request to those responsible for the treatment of their information. This right may be exercised, among others, to correct partial, inaccurate, incomplete, fractioned or misleading data, or those whose treatment is expressly prohibited or has not been authorized.

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- To request proof of the authorization granted to the data administrator, except when this is explicitly excepted by article 10 of this law.
- To be informed upon request to the administrator of the information, what use has the organization given to his/her personal data.
- To submit to the Colombian Superintendence of Industry and Commerce any complaints about infractions of the provisions of this law and the other norms that modify, add or complement it.
- To revoke the authorization and / or request the deletion of the data when the treatment does not respect the principles, rights and constitutional and legal guarantees. The revocation and / or suppression will proceed when the Superintendence of Industry and Commerce has determined that in the treatment the person in charge or charge has incurred in conducts contrary to this law and the Constitution.
- To access free of charge to your personal data that have been processed.

Authorization

The processing of personal data by Intramar Shipping S.A.S, implies a prior and informed authorization by the Owner unless the data is public. Therefore, Intramar Shipping S.A.S, will adopt a procedure to request the collection of personal data and will inform the purposes for which they will be stored, guaranteeing the possibility of verifying the granting of said authorization. The authorization may be given verbally, by letter or by means that will guarantee its subsequent consultation.

The Owner commits to provide true, accurate, authentic and up-to-date information, and is responsible for its content and the damages it could cause to Intramar Shipping S.A.S, or to third parties. The Owner must attempt to keep the information updated.

Area responsible for the processing of personal data

The legal area will be the area in charge of handling requests, queries and claims before which the Owner of the information may exercise its rights and therefore consult, update, modify, rectify, correct or delete its information at any time. For this purpose, the Owner must send an email to intramar@intramar.com.co; or call the following landline: (57 + 1) 7 46 6775.

Intramar employees responsible for managing the personal data of the Owners must abide by the following rules for safety, formality and traceability of the operation:

Elaborado por: Julio César Cháves Cargo: Líder de Calidad y Seguridad Firma: **(firmado el original)** Revisado por: Nicolás Gärtner Cala Cargo: Gerente General Firma: **(firmado el original)**

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- a. To inform from the first contact, that all information exchange should be made by electronic means (personal or corporate mail).
- b. A security test will be applied to any information request by telephone to ensure the veracity of the request and the authorization of the one who requests it.
- c. After a telephone conversation any commitment, agreement or responsibility will be formally informed to the Owners registered personal or corporate mail.

Intramar ensures the transparency of its employees through security filters before and during their hiring process, which allows us it to provide a reliable operation in the administration and management of the personal data of the Owners.

Procedure for holders of information to exercise their rights

The Owner or his/her authorized representative may consult the personal information of the Owner that rests in any of the organizations databases.

To this end, the above persons must prove the following information:

- First and last names
- Accredit the quality in which it acts
- Type of document
- Telephone
- Email
- City
- Subject

The consultation will be responded within a maximum term of ten (10) business days counting from the its date of receipt. When it is not possible to reply the consultation within the term, the interested party will be informed, stating the reasons for the delay as well as the date on which the consultation will be responded. The latter will in no case exceed five (5) working days after the expiration of the first term.

If the Owner or his/her successors or representative claims that the information contained in a database should be subject to correction, updating or deletion, or when it reports an infraction of the law, he/she may submit a request containing the following information:

- Identification of the Owner or its successor/representative
- The description of the facts that give rise to the claim
- The address
- The documents related to the required amendment.

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DATA TREATMENT AND PROTECTION POLICY Version 4.0

If the claim is incomplete, the interested party will be contacted within five (5) business days following the receipt of the claim to correct the faults. If after one (1) month from the date of the request, the requester does not submit the required information, it will be understood that the claim has been abandoned.

The maximum term to attend the claim will be fifteen (15) business days counting from the day following the date of receipt. When it is not possible to reply to the claim within aforesaid term, the requester will be informed of the reasons for the delay and the date on which the claim will be handled. The latter cannot exceed eight (8) business days following the expiration of the first term.

Intramar Shipping S.A.S, reserves the right to modify this policy at any time and any modification will be informed and published. If applicable, a new authorization will be requested when the change refers to the purpose of the treatment.

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Control de cambios al documento

Versión revisada	Descripción de la modificación o anulación (incluya la fuente que origina el cambio)	Versión vigente
1.0	Es actualizado el documento por cambio de tipo de sociedad de la organización.	2.0
2.0	Es revisada en redacción y ortografía para su envío a la asociación FIDI.	3.0
3.0	Se actualiza el diseño por cambio de logo e imagen corporativa.	4.0

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