

TREATMENT POLICY FOR THE PROTECTION OF PERSONAL DATA OF THE HOLDERS

GRUPO SPIRA S.A.S.

Complying with the provisions of Statutory Law 1581 of 2012 and its Decree Regulatory 1377 of 2013, GRUPO SPIRA S.A.S. adopts the present policy for the treatment of personal data; which will be informed to all the holders of the data collected, that in the future is obtained in the exercise of commercial or labor activities.

In this way, GRUPO SPIRA S.A.S. states that it guarantees the rights of privacy, privacy, good name and autonomy in the treatment of personal data and – in consequence - all actions will be governed by the principles of legality, purpose, freedom, veracity or quality, transparency, access, restricted circulation, security and Confidentiality.

All the people who in development of different commercial activities, labor, among others- whether permanent or occasional - will come to supply GRUPO SPIRA S.A.S., any type of information or personal data can know, update and rectify.

I. IDENTIFICATION OF THE RESPONSIBLE OF THE TREATMENT

NAME OF THE PERSON RESPONSIBLE: GRUPO SPIRA S.A.S., a company with its main domicile in the city of Bogotá, constituted under Colombian law by means of public deed No. 001495 of the notary 8 of Bogotá on June 5, 2001, with NIT: 830.090.315-0.

ADDRESS AND ADDRESS: GRUPO SPIRA S.A.S. has its domicile in the city of Bogotá, and its The main headquarters is located at 75th Street No. 22 - 10.

EMAIL: datospersonales@grupospira.com

TELEPHONE: (57-1) 7427273

II. LEGAL FRAMEWORK

- Political Constitution, Article 15: all people have the right to privacy personal and family and his good name, and the State must respect them and make them respect.

In the same way, they have the right to know, update and rectify the information that have collected on them in the data banks and in the files of public entities and private. In the collection, treatment and circulation of data, freedom and other guarantees enshrined in the Constitution. Correspondence and other forms of private communication are inviolable. They can only be intercepted or registered by judicial order, in the cases and with the formalities established by law.

- Law 1581 of 2012: by which general provisions for data protection are issued personal

- Regulatory Decree 2952 of 2010: by which articles 12 and 13 of the regulation are regulated Law 1266 of 2008.

- Partial Regulatory Decree 1377 of 2013: by which partially regulates the Law 1581 of 2012.

III. AREA OF APPLICATION

This policy will be applicable to personal data registered in any database of GRUPO SPIRA S.A.S., under the terms of Law 1581 of 2012. IV. DEFINITIONS For the purposes of this policy and in accordance with the current regulations in matter of protection of personal data, the following definitions will be taken into account:

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

Privacy notice: verbal or written communication generated by the Responsible, addressed to the Holder for the processing of your personal data, by which you are informed about the existence of the information treatment policies that will be applicable to you, the way to access the same and the purposes of the treatment that is intended to give personal data. Database: organized set of personal data that is subject to treatment. Causairee: person who has succeeded to another due to the death of the heir of the latter. Personal data: any information linked to or associated with one or more people determined or determinable natural Public data: is the data that is not semi-private, private or sensitive. They are considered data public - among others - data relating to the civil status of persons, their profession or trade and your quality as a merchant or as a public servant. By its nature, public data may be contained - among others - in public records, public documents, gazettes and newsletters and as well as duly enforceable judicial sentences that are not subject to reservation Sensitive data: sensitive data is understood to be those that affect the privacy of the Owner or whose improper use can generate their discrimination, such as revealing racial origin or ethnicity, political orientation, religious or philosophical convictions, membership of trade unions, social organizations, of human rights, that promotes the interests of any party politically or to guarantee the rights and guarantees of opposition political parties, as well as data related to health, sex life and biometric data.

In charge of the Treatment: natural or legal person, public or private, that by itself or in association with others, perform the processing of personal data on behalf of the person responsible Treatment. Responsible for the Treatment: natural or legal person, public or private, which by itself or in association with others, decide on the database and / or the treatment of the data.

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

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

Transfer: the transfer of data takes place when the person in charge and / or in charge of the treatment of personal data, located in Colombia, sends information or data personnel to a receiver who - in turn - is responsible for the treatment and is inside or outside the country.

Transmission: the treatment of personal data that implies the communication of the same inside or outside the territory of the Republic of Colombia when its purpose is to carry out a treatment by the person in charge on behalf of the person in charge.

V. PRINCIPLES

For the purpose of guaranteeing the protection of personal data, GRUPO SPIRA S.A.S. will apply harmonious and integral way the following principles, in light of which the treatment, transfer and transmission of personal data:

Principle of legality in the field of data processing: the data processing is a regulated activity, which must be subject to the legal provisions in force and applicable they govern the subject.

Principle of purpose: the activity of the processing of personal data made by GRUPO SPIRA S.A.S. or to which he has access, they will obey a legitimate purpose consistent with the Political Constitution of Colombia, which must be informed to the respective owner of the data personal Principle of freedom: the processing of personal data can only be done with the prior, express and informed consent of the Holder. Personal data cannot be obtained or disclosed without prior authorization or in the absence of legal, statutory or judicial that relieves the consent.

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

Principle of transparency: in the processing of personal data, GRUPO SPIRA S.A.S. will guarantee the Holder his right to obtain at any time and without restrictions, information about the existence of any type of information or personal data that is of interest or ownership.

Principle of access and restricted circulation: the processing of personal data is subject to the limits that derive from the nature of these, the provisions of the law and the Constitution. As a consequence, the treatment can only be done with persons authorized by the owner and / or by the people provided by law. Personal data, except for public information, may not be available on the Internet or other means of dissemination or mass communication, except that access is technically controllable to provide restricted knowledge only to holders or third parties authorized according to the law.

Principle of security: the information subject to treatment by GRUPO SPIRA S.A.S., shall be handled with the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use, access not authorized or fraudulent.

Principle of confidentiality: all the people who, in GRUPO SPIRA S.A.S., administer, handle, update or have access to information of any kind that is in databases, are obliged to guarantee the reservation of information, so that commit to keep and keep strictly confidential and not disclose to third parties, all the information that they will come to know in the execution and exercise of their functions; except in the case of activities expressly authorized by the data protection law. This obligation persists and will remain inclusive, after the termination of your relationship with any of the tasks that comprise the Treatment.

VI. RIGHTS OF THE INFORMATION HOLDER

In accordance with what is contemplated by the current regulations, applicable in terms of protection of data, the following are the rights of the holders of personal data:

- a.** Access, know, update and rectify your personal data in front of the SPIRA GROUP S.A.S., in its capacity as responsible for the treatment. This right may be exercised - among others - against partial, inaccurate, incomplete, fractioned, misleading data or those whose treatment is expressly prohibited or has not been authorized.
- b.** Request proof of the authorization granted to GRUPO SPIRA S.A.S., for the treatment of data, by any valid means except in cases where authorization is not necessary.
- c.** To be informed by GRUPO SPIRA S.A.S., upon request, regarding the use it has given to its personal information.
- d.** Present before the Superintendence of Industry and Commerce or the entity that took its place, complaints about infractions to the provisions of law 1581 of 2012 and the other rules that the modify, add or complement, previous processing of consultation or requirement before GRUPO SPIRA S.A.S.

e. 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.

F. Access free of charge to your personal data that have been processed, at least once each calendar month, and each time there are substantial modifications of the present policy that motivates new consultations.

These rights may be exercised by:

- The owner, who must prove his identity sufficiently by the different means made available to GRUPO SPIRA S.A.S.
- The representative and / or agent of the owner, after accreditation of the representation or empowerment
- Other in favor or for which the owner has stipulated.

RIGHTS OF CHILDREN AND ADOLESCENTS

In the processing of personal data, respect for the prevailing rights of the minors.

The processing of personal data of minors is prohibited, except for those data that are of a public nature and, in this case, the treatment must comply with the following parameters:

- a. Respond and respect the best interests of minors
- b. Ensure respect for the fundamental rights of minors.

It is the task of the State and educational entities of all kinds, provide information and train to the legal representatives and tutors on the possible risks faced by the children and adolescents regarding the improper treatment of their personal data and provide of knowledge about responsible and safe use by children and adolescents of your personal data, your right to privacy and protection of your personal information and the one of the others.

VII. DUTIES OF GRUPO SPIRA S.A.S. AS RESPONSIBLE AND RESPONSIBLE FOR THE TREATMENT OF PERSONAL DATA

GRUPO SPIRA S.A.S., recognizes the ownership of personal data held by individuals and consequently they, exclusively, can decide on them. Thus, GRUPO SPIRA S.A.S., will use the personal data for the fulfillment of the purposes expressly authorized by the owner or by the regulations in force.

- a.** Guarantee to the owner, at all times, the full and effective exercise of the right of habeas data.
- b.** Request and keep a copy of the respective authorization, granted by the owner, for the treatment of personal data.
- c.** Properly inform the owner about the purpose of the collection and the rights that they attend by virtue of the authorization granted.
- d.** Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, unauthorized or fraudulent access.
- e.** Ensure that the information is true, complete, accurate, updated, verifiable and understandable.
- f.** Update the information in a timely manner, taking care of all the news in this way regarding the holder's data. Additionally, all measures must be implemented necessary for the information to be kept up-to-date.
- g.** Rectify the information when it is incorrect and communicate the pertinent.
- h.** Respect the security and privacy conditions of the holder's information.
- i.** Process inquiries and claims formulated in the terms indicated by law.
- j.** Identify when certain information is under discussion by the owner.
- k.** Inform, at the request of the owner, about the use given to their data.
- l.** Inform the data protection authority when there are violations of the codes of security and there are risks in the administration of the information of the holders.
- m.** Comply with the requirements and instructions issued by the Superintendence of Industry and Commerce on the subject in particular.
- n.** Use only data who's processing is previously authorized in accordance with provided for in law 1581 of 2012.
- o.** Ensure the proper use of the personal data of children and adolescents, in those cases in which the processing of your data is authorized.
- p.** Register in the database the legends "claim in process" in the form in which it is regulated in the law.
- q.** Insert in the database the legend "information in judicial discussion", once notified by the competent authority on judicial proceedings related to the quality of the personal data r. Refrain from circulating information that is being contested by the owner and whose blocking has been ordered by the Superintendence of Industry and Commerce
- s.** Allow access to information only to people who can access it.
- t.** Use the personal data of the owner only for those purposes in which you are duly empowered and respecting, in all cases, the current regulations on protection of personal data.

VIII. AUTHORIZATION AND CONSENT OF THE HOLDER

GRUPO SPIRA S.A.S. requires the free, prior, and express and informed consent of the owner of personal data for the treatment thereof, except in the cases expressly authorized in the law, namely:

- a. Information required by a public or administrative entity in the exercise of its functions legal or by court order.
- b. Data of public nature.
- c. Cases of medical or sanitary emergency.
- d. Processing of information authorized by law for historical, statistical or scientists.
- e. Data related to the Civil Registry of people.

Manifestation of authorization

The authorization to GRUPO SPIRA S.A.S. for the processing of personal data will be granted by:

- the owner, who must prove his identity sufficiently by the different means made available to GRUPO SPIRA S.A.S.
- The titleholders of the owner, who must prove such quality.
- The representative and / or agent of the owner, after accreditation of the representation or empowerment
- Other in favor or for which the owner has stipulated.

Means for granting authorization

GRUPO SPIRA S.A.S. will obtain the authorization through different means including the physical document, electronic, data message, Internet, websites or in any other format that - in any case - allows the obtaining of consent through unambiguous behaviors through which it is concluded that, if it has not been supplied, by the owner or the legitimated person, the data would not have been stored or captured on the basis of data.

The authorization will be requested by GRUPO SPIRA S.A.S., prior to the treatment of the personal information.

Proof of authorization

GRUPO SPIRA S.A.S. shall retain proof of the authorization granted by the holders of the personal data for its treatment and then use the mechanisms available to its scope now as well as take the necessary actions to maintain the record of the form and date in which it was obtained. Consequently, GRUPO SPIRA S.A.S., will be able to establish physical files or electronic repositories made directly or through third parties hired for that purpose.

Revocation of the authorization.

The holders of personal data may, at any time, revoke the authorization granted to GRUPO SPIRA S.A.S. for the processing of your personal data or request the suppression of the same, as long as it is not prevented by a legal provision or contractual. GRUPO SPIRA S.A.S. establish simple and free mechanisms that allow the holder revoke his authorization or request the deletion of his personal data, at least for the same medium that granted it. For the above, it must be taken into account that the revocation of consent may be expressed, on the one hand, totally in relation to the authorized purposes and - so both - GRUPO SPIRA S.A.S., must cease any data processing activity; and for the other, partially, in relation to certain types of treatment in which case these will be on which the treatment activities will cease, as for advertising purposes, among others. In this last case, GRUPO SPIRA S.A.S. may continue to process personal data for those purposes in relation to which the owner has not revoked his consent.

IX. TREATMENT TO WHICH THE DATA AND PURPOSE OF THE SAME WILL BE SUBMITTED

The treatment of personal data of employees, former employees, retirees, suppliers, contractors or of any person with whom GRUPO SPIRA S.A.S. I had established or establish a relationship, permanent or occasional, will be carried out within the legal framework that regulates subject matter and by virtue of its status as COMPANY, and will be all necessary for the fulfillment of the institutional mission. In any case, personal data may be collected and processed to:

- a.** Perform the sending of information related to programs, activities, news, content by area of interest, products and other goods or services offered by GRUPO SPIRA S.A.S.
- b.** To develop the mission of GRUPO SPIRA S.A.S. according to its statutes.
- c.** Comply with applicable regulations for suppliers and contractors, including but not limited to tributary and commercial.
- d.** Comply with the provisions of the Colombian legal system on labor and social security - among others - applicable to former employees, current employees and candidates for future employment.
- e.** Develop programs according to their statutes.
- f.** Fulfill all your contractual commitments.

For the processing of personal data of children and adolescents will proceed according to the contemplated in the present policy in the aside related to their rights.

Sensitive data

In the case of sensitive personal data, GRUPO SPIRA S.A.S. You can use and Treatment of them when:

- a.** The owner has given his explicit authorization, except in cases that by law is not required granting of said authorization.
- b.** The treatment is necessary to safeguard the vital interest of the owner and this is found physically or legally incapacitated. In these events, legal representatives must grant your authorization.
- c.** The Treatment is carried out in the course of legitimate activities and with due guarantees on the part of a foundation, NGO, association or any other organism without spirit of profit, whose purpose is political, philosophical, religious or union whenever they refer exclusively to its members or to persons who maintain regular contacts reason for its purpose. In these events, the data cannot be provided to third parties without the authorization of the owner .
- d.** The Treatment refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process.
- e.** The treatment has a historical, statistical or scientific purpose. In this event they should adopt the measures leading to the suppression of identity of the owners, without prejudice to the exceptions provided by law; in the treatment of sensitive data is requires the prior, express and informed authorization of the owner, which must be obtained by any means that may be subject to further consultation and verification.

X. PRIVACY NOTICE

The Privacy Notice is the physical document, electronic or in any other format, put the holder's disposition to inform him about the treatment of his personal data.

- a.** Through this document, the holder is informed of the information related to the existence of the information processing policies of GRUPO SPIRA S.A.S. and what will be applicable, the way to access them and the characteristics of the treatment that is intended to be given to personal information. The Privacy Notice must contain, at least, the following information: to. The identity, address and contact information of the controller.
- b.** The type of treatment to which the data will be submitted and the purpose of the same.
- c.** The rights of the owner.
- d.** The general mechanisms provided by the person in charge so that the owner knows the policy of information processing and the substantial changes that occur in it. In In all cases, you must inform the owner how to access or consult the treatment policy of information.
- e.** The optional nature of the answer regarding questions about sensitive data.

XI. GUARANTEES OF THE RIGHT OF ACCESS

To guarantee the right of access of the owner of the data, GRUPO SPIRA S.A.S. will put disposition of the latter, prior accreditation of their identity, legitimacy or personality of their representative - without cost or expense - in a detailed and detailed manner, the respective personal data through all types of media, including electronic media that allow the owner direct access to them. This access must be offered without any limit and they should allow the owner the possibility of knowing and updating them online.

XII. PROCEDURE FOR THE ATTENTION OF CONSULTATIONS, CLAIMS, PETITIONS OF DATA RECTIFICATION, UPGRADING AND SUPPRESSION

a. Queries:

Holders or their successors in title may consult the personal information of the owner that repose in GRUPO SPIRA S.A.S., who will supply all the information contained in the registry individual or that is linked to the identification of the Holder.

With respect to the attention of requests for consultation of personal data GRUPO SPIRA S.A.S. guarantees:

- Enable electronic or other means of communication that you consider relevant.
- Establish forms, systems and other simplified methods which should be informed in the privacy notice.
- Use the customer service or claims services you have in operation. In any case, regardless of the mechanism implemented for the attention of requests for consultation, they will be answered within a maximum term of ten (10) business days counted from the date of receipt. When it was not possible to attend the consultation within said term, the interested party will be informed before expiration of the 10 days, expressing the reasons for the delay and indicating the date in that your consultation will be attended, which in no case may exceed five (5) days working after the expiration of the first term. Consultations may be made at the mail datospersonales@grupospira.com

b. Claims

The Holder or his successors in title who consider that the information contained in a base of data must be corrected, updated or deleted, or when the alleged breach of any of the duties contained in the law, may file a claim before the COMPANY, which will be processed under the following rules:

- 1.** The claim of the Holder will be formulated by means of a request addressed to GRUPO SPIRA S.A.S. to the email datospersonales@grupopsira.com with the identification of the holder, the description of the facts that give rise to the claim, the address and accompanying the documents that you want to assert. If the claim is incomplete, it will be required interested party within five (5) days following receipt of the claim so that 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 he has withdrawn the claim. In case the person receiving the claim is not competent to resolve it, it will give transfer to the corresponding party within a maximum period of two (2) business days and inform the situation to the interested party.
- 2.** Once the complete claim has been received, it will be labeled with the "claim in procedure" and the reason thereof, in a term not exceeding two (2) business days. The label will be maintained until the claim is decided.
- 3.** The maximum term to attend the claim will be fifteen (15) business days counted from the day following the date of receipt. When it is not possible to meet the claim within of said term, the interested party shall be informed of the reasons for the delay and the date on which will attend your claim, which in no case may exceed eight (8) business days following the expiration of the first term.

c. Request for update and / or rectification

GRUPO SPIRA S.A.S. rectify and update, at the request of the owner, the information of the latter that prove to be incomplete or inaccurate in accordance with the procedure and terms before indicated, for which it will be taken into account:

- 1.** The owner must attach the request to the email datospersonales@grupopsira.com, indicating the update and / or rectification to be made and will provide the documentation that supports your request.
- 2.** GRUPO SPIRA S.A.S. may enable mechanisms that facilitate the exercise of this right to the owner, as long as they benefit it. As a result, media can be enabled electronic or other that you consider pertinent, which will be informed in the notice of privacy and will be made available to those interested in the website.

d. Request for data deletion

The holder of the personal data has the right to request GRUPO SPIRA S.A.S. the suppression of the data (deletion) in any of the following events:

- 1.** Consider that they are being treated according to the principles, duties and obligations established in the current regulations.
- 2.** They have ceased to be necessary or pertinent for the purpose for which they were collected.
- 3.** The necessary period for the fulfillment of the purposes for which they were collected.

This suppression implies the total or partial elimination of personal information in accordance with requested by the owner in the records, files, databases or treatments carried out by GRUPO SPIRA S.A.S. However, this right of the owner is not absolute and consequently GRUPO SPIRA S.A.S. may deny the exercise thereof when:

- a. The holder has a legal or contractual duty to remain in the database.
- b. The elimination of data hinder judicial or administrative actions linked tax obligations, the investigation and prosecution of crimes or the updating of sanctions administrative.
- c. The data is necessary to protect the interests of the owner legally protected; for perform an action based on public interest or to fulfill a legal obligation acquired by the owner.

XIII. NATIONAL DATABASE REGISTRY

The National Registry of Databases is the public directory of the databases subject to Treatment operating in the country. The registry will be administered by the Superintendence of Industry and Commerce and will be of free consultation for citizens. To perform the registration of databases, those interested should contribute to the Superintendence of Industry and Commerce the information treatment policies, which will oblige those in charge and responsible for the same and whose breach will carry the corresponding penalties. The Treatment policies, in no case, may be inferior to the duties contained in the present law.

XIV. SECURITY OF INFORMATION AND SECURITY MEASURES

Complying with the safety principle established in the current regulations, GRUPO SPIRA S.A.S. will adopt the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or access not authorized or fraudulent.

XV. RESPONSIBLE AND RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

GRUPO SPIRA S.A.S. will be responsible for the processing of personal data. The Administrative Department will be responsible for the processing of personal data, for account of GRUPO SPIRA S.A.S.

XVI. VALIDITY

This policy applies as of April 18, 2014 and leaves without effect the regulations or special manuals that could have been adopted by GRUPO SPIRA S.A.S.
The document was updated in the month of July 2016.

JANETH BELTRAN
Administrative manager