

PERSONAL DATA PROCESSING POLICY– THE SPOT FOR STUDENTS

FIRST CHAPTER

GENERAL DISPOSITIONS

I. Responsible for the processing of personal data.

Company Name	<i>Spot Centro S.A.S.</i>
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II. Definitions

In order to ensure that the contents of this processing policy are fully understood, we hereby allow ourselves to state the following concepts:

- a. **Authorization:** Prior, express, and informed consent that any person gives so that the one Responsible for the processing of personal data can use their data;
- b. **Privacy notice:** It is the verbal or written communication addressed to the Holders of the information, in order to inform them about the existence of the information treatment policies and the ways of accessing them, as well as the purpose of its collection and use;
- c. **Database:** Organized set of personal data that is the subject to Processing;
- d. **Personal data:** Any information linked to natural persons that is of a private nature, that is, which is linked to their personal information or their privacy;
- e. **Public data:** Data regarding their marital status, their profession or occupation, and their status as a merchant or public servant.

- f. **Semi-private data:** Data that are not private, reserved, nor public in nature, and the knowledge or disclosure of which may be of interest not only to the holder but to a certain sector.
- g. **Sensitive data:** Sensitive data are those which affect the Holder's privacy, or the improper use of which can lead to their discrimination.
- h. **Private data:** It is the data which, given its private or reserved nature, is only relevant for the Holder.
- i. **Person in charge of the processing:** Natural or legal person who performs the processing of personal data, as delegated by the Responsible for processing, receiving instructions regarding the administration of that data.
- j. **Security incident:** Violation of the security codes, loss, theft, and/or unauthorized access to information of a database administered by the Responsible for processing or by their Person in charge.
- k. **Responsible for processing:** Natural or legal person, public or private, who decides on the purpose of the databases and/or their processing.
- l. **Processing:** Any operation or set of operations with personal data, such as collection, storage, use, circulation, or deletion.
- m. **Holder:** Natural person whose personal data are subject to Processing.
- n. **Transfer:** The data transfer takes place when the Responsible for processing and/or the Person in charge of the personal data, sends the information to another recipient, who, in turn, becomes Responsible for the data.
- o. **Transmission:** Communication of the data inside or outside the national territory to a Person in charge for them to perform the processing of personal data on the Responsible for processing's behalf.

III. Purpose of the Policy

The Personal Data Processing Policy – The Spot for Students, has the purpose of determining the mechanisms, communication channels, and other guidelines under which the Responsible for processing will execute the processing of personal data that lie in their physical and digital databases.

IV. Scope of the Policy

The Personal Data Processing Policy – The Spot for Students, establishes the procedures that the Responsible for processing carries out for personal data processing, mechanisms for the exercise of the habeas data right, as well as the purposes, security measures, and other aspects related to the protection of personal information.

This Personal Data Processing Policy is directed to:

1. Clients and prospective clients.
2. Tenants and Residents
3. Visitors.
4. Employees.
5. Suppliers and Contractors.
6. People in charge of the information, and, in general,

any holder of the information, either acting on his own behalf, or as a legal representative, who by any legal link is linked to the Responsible for processing or whose personal information is required in any case.

V. Legal framework.

1. Political Constitution, article 15.
2. Law 1266 of 2008.
3. Law 1581 of 2012.
4. Regulatory Decrees 1727 of 2009 and 2952 of 2010.
5. Partial Regulatory Decree 1377 of 2013.
6. Rulings C – 1011 of 2008, and C - 748 of 2011, made by the Colombian Constitutional Court.

SECOND CHAPTER

PERSONAL DATA PROCESSING

I. Types of Databases

In order to fulfill the purposes previously informed to the holders, Spot Centro will administer the following databases:

- a) CLIENT AND PROSPECTIVE CLIENT DATABASES.

This category collects the personal data of those people who contact Spot Centro through any of the established channels or in a physical or digital way, with commercial or informative purposes, as well as those people who subsequently are linked as clients.

- b) PAYROLL DATABASES

This category includes the data and/or databases related to the management of the payroll, that is to say, that this category includes all kinds of data that are necessary for the strict compliance with the current normativity, especially the regulations regarding social

security, occupational health and safety management systems, and, in general, the administration and direction of the personnel.

c) SUPPLIER AND CONTRACTOR DATABASES.

This category includes the data and/or databases regarding the management of suppliers and contractors.

d) VISITOR DATABASES

This category includes the data and/or databases of visitors, for the purpose of controlling entry and exit, and for security purposes.

According to the classification of the National Registry of Personal Databases, the data categories administered by Spot Centro in their databases, are defined in Annex 1.

Annex 1.

IDENTIFICATION DATA	Clients / Prospective clients	Payroll	Suppliers / Contractors	Visitors
General Identification Data of the person: Names, last name, ID type, ID number, place and date of issue, marital status, sex, etc.	X	X	X	X
Specific identification data of the person: Signature, nationality, family data, electronic signature, other identification documents, place and date of birth, death, age, etc.	X	X	X	
LOCATION DATA				
Location data related to people's commercial or professional activity: address, phone number, e-mail address	X	X	X	
Location data related to people's private activity: home address, phone number, e-mail address, etc.	X	X	X	
SENSITIVE DATA				
Data related to the person's health: Image, endoscopies, pathologies, studies, etc.				
DATA OF SOCIOECONOMIC CONTENT				
Data related to the person's economic activity		X	X	

Data related to the person's work history, work experience, position, start and termination dates, annotations, warnings, etc.		X		
Data related to the person's educational level, training, and/or academic records.	X	X		
General data related to affiliation and contributions to the social security system: EPS; IPS; ARL, dates of entry/retirement EPS, AFP, etc.	X	X		
OTHER DATA				
Data on people's legal and/or disciplinary history.				
Personal data for accessing information systems: usernames, IP, passwords, profiles.		X		

II. Area in charge

III. Personal Data Processing Procedure

1. Collection

The processing of personal data carried out by Spot Centro is obtained from different activities related to its social object, and the obligations it has as an employer. The information is obtained directly from the holder.

For that matter, we relate the instruments for the collection of personal data, according to the database they are located in, below

SPOT CENTRO PERSONAL INFORMATION COLLECTION				
Responsible Divisions	Database	Personal information collection instruments	Method of obtaining authorization	
			Holder	Third party authorized by holder
Commercial Division	Clients and Prospective Clients	Application form on the website https://thespotforstudents.com/	X	
		Via phone		X
		In Person	X	
		Student Housing Contract	X	

Administrative Division	Payroll	Curriculum Vitae	X	
		Work and academic certifications		X
		Copy of identification document	X	
Administrative Division	Suppliers	Contract	X	
		Certificate of Existence and Legal Representation	X	
		RUT (Tax Register)	X	
Front Desk	Visitors	Form – Visitor Control	X	

2. Storage

The storage of the personal information contained in the databases is located on our own servers and has all the physical security, technical, and administrative measures, with access controls to the information.

Regarding images, which are captured through the security cameras, the storage length is _____() calendar days, time after which said information is deleted.

3. Uses and purposes of information collection

The use and purpose of the information collected and stored in the databases, has different objectives, among them are:

USES

a) Circulation

Spot Centro does not share the personal data it collects with third parties. Exceptionally, the information is validated with the Insurance Agencies, without implying any transfer and/or transmission of personal data.

b) Deletion

The deletion of personal information is done once the purpose for which the data was requested has been fulfilled, in accordance with the authorizations and/or contracts and agreements that the holder of the information has previously agreed with Spot Centro.

1. Commercial, administrative, informative, marketing, or sales related activities.
2. To execute the pertinent managements for the accomplishment of the social object of the company in relation to the fulfillment of the contract celebrated with the Holder of the information.
3. To offer all sorts of commercial services; as well as to carry out promotion, marketing, and advertising campaigns.

4. To carry out customer satisfaction surveys regarding the goods and services offered by Spot Centro S.A.S.
5. To provide contact information to the commercial force and/or distribution network, telemarketing, market research, and any other third party with whom Spot Centro S.A.S. has a contractual relationship for the performance of such activities (market research and telemarketing, etc.) for the execution thereof.
6. To contact the Holder via telephone to perform surveys, studies, and/or confirmation of personal data necessary for the execution of the contractual relationship.
7. To contact the holder by sending information via e-mail, cell phone - via text messages (SMS and/or MMS) or through the use of mobile applications such as WhatsApp or similar, commercial, advertising, or promotional information about the products and/or services; events and/or promotions, in order to promote, invite, inform, and carry out campaigns, promotions, or contests of a commercial or advertising nature which will be subject to the terms and conditions stated therein.
8. Commercial, administrative, informative, marketing, or sales related activities.
9. To contact the Holder via e-mail to send statements, account balances or invoices in relation to the obligations derived from the contract celebrated between the parts.
10. Transferring personal data outside of the country to the companies within the business group to comply with the anti-money laundering regulations that apply to them.
11. Internal statistics management, citizen/customer service (Claims Management).
12. Customer loyalty, Sending communications
13. Administrative procedures, Information Systems Administration, password management, username management, Operational development
14. Invoicing Management, Accounting Management, Management of suppliers and contractors, Economic and accounting management, History of commercial relations, Requirements by control bodies
15. Opinion surveys, Commercial prospecting, Own advertising, Market segmentation, Product and service offers.
16. Schedule control, personnel training, personnel management, temporary work management, social benefits, prevention of occupational risks, personnel promotion and selection.

4. Personal Data Processing Authorization

Spot Centro previously requests, verbally or in writing, authorization from the holders of personal data and this authorization may be recorded in any physical, electronic, or digital medium or in any format that guarantees its subsequent consultation through the technical tools, complying with the requisites established by the law.

5. Authorization for the Processing of Boys', Girls', and Teenagers' Data

Spot Centro collects data from minors in the following cases:

- a) From their Parents who work at Spot Centro, for social security affiliation purposes.
- b) From the Guardians of underage teenagers who reside in Spot Centro's facilities or who hold any type of contractual relationship.

6. Protection Measures

Spot Centro has adopted the necessary technical, legal, human and administrative measures to ensure the security of personal data by protecting the confidentiality, integrity, use, unauthorized and/or fraudulent access. Likewise, Spot Centro has implemented internal, mandatory security protocols for all personnel with access to personal data and information systems.

The internal security policies under which the holder's information is stored to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access, are as follows:

- a) Technological implementation policies that protect the organization's computers and servers from malware.
- b) Policies for the Processing of Personal Information.
- c) Internal procedure manuals for the processing of personal information..
- d) Confidentiality clauses in employment contracts.
- e) Confidentiality clauses in contracts with suppliers and contractors.
- f) Authorizations for the processing of data in the formats and spaces where personal information is captured.
- g) Personal information access control policies.

THIRD CHAPTER

RIGHTS OF THE PERSONAL DATA HOLDERS

I. Holders' Rights.

- a. To know, update, and rectify their personal data with the ones Responsible for Processing or the Person in charge of the Processing.

This right may be exercised, among others, regarding partial, inaccurate, incomplete, fractioned, or misleading data, or data the processing of which is expressly prohibited or has not been authorized;

- b. Requesting proof of the authorization granted to the Responsible for Processing, except in cases determined by the law.
- c. To be informed by the Responsible for Processing or the Person in charge of the Processing, upon prior request, about the use that has been given to their personal data.
- d. To request the revocation of the authorization and/or request the deletion of the data when the Processing does not respect the constitutional and legal principles, rights and guarantees. The revocation and/or deletion will occur when the Superintendence of Industry and Commerce has determined that in the Responsible for Processing or the Person in charge of the Processing have engaged in conduct contrary to this law and the Constitution;
- e. Free-of-charge access to their personal data that has been subject to Processing.

II. Procedure for information holders to exercise their rights

a) Consultation

Through the consultation mechanism, the data holder may request Spot Centro access to their personal information that is stored in the databases.

The query shall be answered within a maximum period of ten (10) working days from the date of its reception. In case the query cannot be answered within the referenced period, they will be informed of the reasons for the delay and they will receive an answer, no later than five (5) working days after the expiration of the first period.

b) Claim

Through the claims mechanism, the data holder may submit a claim to Spot Centro, regarding any discomfort they may have about the use that is being given to their data.

The claim will be addressed within a maximum period of fifteen (15) working days from the day following the date of its receipt. In case the claim cannot be addressed within this period, they will be informed of the reasons for the delay and they will receive an answer,

no later than eight (8) working days after the expiration of the first period.

In case the claim is incomplete, they will be required, within the five (5) days following the reception of the claim for them to correct said faults. After two (2) months from the date of the request, if the required information has not been submitted, the claim will be deemed to have been withdrawn.

In case Spot Centro is not competent to resolve the claim, it shall notify the corresponding party within a maximum period of two (2) working days and inform the holder of the situation.

III. Individuals with the right to make a consultation or claim

The individuals with the right to request a consultation to Spot Centro, are the following:

- 1) The employers, contractors, suppliers, and collaborators that have had any relationship with Spot Centro
- 2) Residents and clients
- 3) Visitors
- 4) Third parties authorized by the Holder or by the law
- 5) In general, any holder of personal information whose data are stored in Spot Centro's databases.

Without prejudice to the aforementioned points, it is hereby clarified that the previous list is informative but not restrictive.

IV. Information to be accredited by the data holder

For consultation and claim matters, the data holder must accredit his identification data, such as:

- a) Full name and last names
- b) Identification type and number
- c) Home address
- d) Contact phone number
- e) E-mail address

In the case of a claim, the holder must attach the documents they want to validate, support or prove for such request. In case they are a minor, such request must be made in a legally legitimated capacity, without being denied the exercise of their rights at any time.

V. Image and Video Request

In case the holder of the information requests access to images and/or videos where their information is captured, they must follow the following procedure:

- a) Provide the events of the request, establishing date and time.
- b) Justify the need for the request
- c) Provide the documents that justify that the holder is the right person to make the request. If the interested party is a third party, they must provide the document authorizing the data holder to access that information.

VI. Procedure for processing Image and/or Video requests

For the procedure to apply, Spot Centro:

Will review said request, and will verify if it is applicable, checking that it does not affect the right to privacy, and other fundamental rights of third parties, different from the holder of the information found in these images and/or videos.

In case it affects fundamental rights of third parties, Spot Centro will internally verify if the facts described by the holder were generated, and will inform the holder about the findings.

In case it does not affect fundamental rights of third parties, Spot Centro will summon the holder of the information to its facilities so that they can observe the required information required.

Available channels for the exercise of Habeas Data rights.

Spot Centro has made the following channel available for holders to exercise their Habeas Data rights:

E-mail address: info@thespotforstudents.com

This is the only channel that Spot Centro has enabled for consultation and claims, therefore, the owner must keep them present.

If any division or person in charge of the information receives a consultation or claim related to personal data protection, they must inform the owner of the existing channels and in no case may they leave the holder of the information without an answer.

Responsible for the compliance with the Personal Data Protection Policy

The Administrative Division at Spot Centro is the division responsible for the effective compliance with the Policy, as well as for consultations and claims related to the protection of personal data of the holders.

In any case, another Spot Centro division might be required to verify the compliance with the regulations regarding personal data protection.

If you have any questions regarding this policy, you can write to info@thespotforstudents.com.

FOURTH CHAPTER

FINAL DISPOSITIONS

I. Permanent Measures

When processing personal data, Spot Centro shall permanently verify in its processes, protocols, procedures and policies, that the right of habeas data is guaranteed to the holders of the information and that the authorization of the holder for the processing of personal data is obtained in accordance with the requirements of the law. Should any division and/or process establish another source of personal information collection, different from those mentioned in point 2.3.1, they shall previously inform the Division acting as Personal Data Officer.

II. Binding Nature of the Policy

Any holder of information who has a relationship with Spot Centro shall abide by this policy.

III. Internal Policy and Personal Data Processing Manual

This policy for the processing of personal data is articulated with the Internal Manual of Policies and Procedures for the processing of personal data, which establishes the criteria, requirements, and procedures to make this policy effective.

Policy Approval Date and Effective Date.

This policy becomes effective on the tenth (10) day of January of the year two thousand and twenty (2020).

SPOT CENTRO S.A.S

NIT 901.334.489 - 1