Mediimplantes

1. General Aspects

Mediimplantes S.A. is committed with the respect and the guarantee of the rights of citizens, users, public employees, contractors, and third parties in general. Therefore, it adopts the following personal data treatment policy with obligatory application in all activities that fully or partially involve collection, storage, use of, traffic of, and suppression of information.

These policies are obligatory and to be strictly complied with within the role of the responsible party of data treatment, as well as all third parties acting on behalf of the entity; or, without acting on behalf of Mediimplantes S.A., those treating personal data by arrangement with Mediimplantes as personal data managers.

Both the responsible party and those in charge (i.e., contractors and third parties) must comply with and respect these policies within the fulfillment of their tasks and/or duties even after legal, commercial, or any other type of links have been terminated. In the same manner, said parties must commit to keep strict confidentiality regarding all data treated.

Any type of breach of such obligations, and in general, of any policy found within this document, must be reported to the Management Control Office, in accordance with article 23of Decree 1377 of 2013.

2. Responsible Party's Identification Details

NAME: Mediimplantes S.A.
ADDRESS: Parque Industrial Bucaramanga Manz. C Bod. 10
CITY: Bucaramanga, Santander
PHONE: (07) 6761915
EMAIL: sqr@mediimplantes.com
WEB ADDRESS: www.mediimplantes.com

3. Norms Governing Personal Data Treatment

Colombia´s Political Constitution, among its catalog of fundamental rights, consecrates within its article nr. 15 every person's right to their intimacy, good name, and habeas data. Joined to it, Statutory Law 1581 of 2012 finds itself as the main normative instrument enacted regarding personal data protection matters. Through this norm, the minimum conditions that must be observed, and through which adequate personal data treatment by responsible parties is to be carried out, are established.

Law 1581 of 2012 was further regulated by decree 1377 of 2013 and decree 886 of 2014, which complemented and further cleared the General Regulation´s normative provisions and specified the reach of duties and obligations of those responsible and in charge of personal data treatment.

Mediimplantes S.A., in quality of responsible of personal data treatment, is committed with compliance of such reference normativity, and consequently, will promote respect of the principles and norms regarding personal data protection amongst its staff and those responsible of personal data management, leading continuous improvement processes and assuring compliance with the law.

4. Definitions

In accordance with the definitions given on the previously exposed legal background, the following definitions of concepts regarding personal data treatment are established:

- **Authorization:** It is the holder's previous, expressed, and informed consent to carry out personal data treatment.
- **Privacy Notice:** Verbal or written communication generated by the responsible of data treatment which is directed to the personal data holder. Such communication informs the holder of the existence of all applicable personal data treatment policies, the means to access them, and the purpose of their personal data treatment.
- **Database:** Organized set of personal data that is subject to treatment.
- **Consultation or Query:** A request by either the personal data holder, by those authorized by said holder, or by the Law, to access information found in any database, either contained in an individual registry or linked to the holder's identification.
- **Personal Data:** Any type of information linked to, or that may be associated with, one or several determined or determinable natural person(s).
- **Private Data:** Data that by its intimate or reserved nature, is only relevant to the holder.
- **Public Data:** Is all data that is neither semi-private, private, nor sensible. Public data is considered, amongst others, data relative to the person's marriage status, their profession or job, and their status as either a merchant or public servant. By its nature, public data can be contained, amongst others, in public registries, public documents, gazettes, official bulletins, and duly executed judicial sentences which are not subject to reservation.
- **Semiprivate Data:** Semiprivate data is that which does not hold intimate, reserved, nor public nature and whose disclosure may be of interest not only to the holder, but to a certain sector or group of people, or to society in general. Financial and credit data are examples of such.
- **Sensible Data:** Sensible data is considered as such when it can affect the holder's intimacy and whose improper use can lead to the holder's discrimination. Examples of such are data revealing the holder's racial or ethnic background, political orientation, religious or philosophical convictions, membership to any syndicates, social organizations, NGO's, human rights-promoting groups, groups promoting the

interests of any political party or those that guarantee the rights and guarantees of opposition-based political parties; data relative to their health status, sexual life, and biometric data.

- **Data Treatment Manager**: Natural or legal person, public or private, who individually or associated with others, performs personal data treatment on behalf of those responsible of such treatment.
- **Data Protection Officer:** Person(s) internally assigned by Mediimplantes S.A. to formally perform the functions of coordinating and controlling compliance with Law 1581 of 2012, as well as queries, complaints, and claims done by personal data Holders.
- **Identifiable Person:** Any person whose identity may be directly or indirectly determined through the use of any information related to their physical, physiological, psychic, economic, cultural, or social identity. A natural person is not to be considered as identifiable if such identification requires disproportionate terms or activities.
- **Claim:** Request done by the data Holder, by those authorized by him/her, or by the Law to correct, update, or delete the Holder's personal data, or to revoke authorization in cases established by the Law
- **Responsible of Data Treatment:** Natural or legal person, either public or private, that by themselves of in association with others, has decision power regarding the database and/or treatment of personal data.
- **Holder** Natural person whose personal data is subject to treatment.
- **Treatment:** Refers to any operation or set of operations on personal data, such as collection, storage, use, traffic, or suppression.
- **Transfer:** Sending of personal data performed by the Responsible or Manager of data treatment from Colombia to another responsible either inside (domestic transfer) or outside the country (international transfer).
- **Transmission:** Treatment of personal data which implies communication of such within national borders (domestic transmission) or outside of Colombia (international transmission). Its purpose is the treatment of data performed by the Manager on behalf of the Responsible party.

5. Principles Governing Data Treatment

Throughout the development, interpretation, and application of Personal Data Treatment on behalf of Mediimplantes S.A., the following principles are to be applied in a harmonic and integral manner, in compliance with article 4 of Statutory Law 1581 of 2012.

- **Lawfulness Principle Regarding Data Treatment:** Mediimplantes's treatment of personal data is an activity bounded by norms, and must comply with what is established in this policy, the constitution, the law, and the judicial decisions adopted by the Colombian Government
- **Meaningful Purpose Principle:** Data treatment must obey a legitimate purpose according to the Constitution and the Law, which must also be informed to the Data Holder.

- **Liberty Principle:** Data treatment can only be practiced with previous, informed, and explicit consent of the Holder. Personal Data shall not be obtained or published without previous authorization, or in the absence of a legal or judicial mandate that relays such consent.
- **Quality and Truthfulness Principle:** Information subject to treatment by Mediimplantes S.A. must be truthful, complete, exact, updated, verifiable, and comprehensible. Treatment of partial, incomplete, fractioned, or data otherwise leading to an eventual error is therefore prohibited.
- **Transparency Principle:** Data treatment must include guaranteeing the Holder's right to obtain information regarding data involving him or her at any moment and without restriction.
- **Access and restricted flow principle:** Data treatment is subject to the limits inherent of personal data, Law matters, and the Constitution. Hence, data Treatment may only be performed by those authorized by the Holder and/or by those provided by the law; personal data, not including public information, should not be available in the internet or through other means of mass communication, except the case in which such access is technically controllable to provide restricted access only to the Holders and/or third parties authorized according to the Law.
- **Safety Principle:** Information subject to treatment by Mediimplantes S.A. shall be managed with the necessary technical, human, and administrative means to provide security to the registries, avoiding their alteration, loss, consult, misuse, or unauthorized or fraudulent access.
- **Non-Disclosure Principle:** All parties that intervene in personal data treatment which are not public by nature are obligated to guarantee non-disclosure of the information, even after any Data Treatment-related activity has been terminated or any relationship to such activity thereof. Provision of personal data or its communication may only be performed when it corresponds to activities authorized by the law and hence under its terms.
- **Ease-of-Access Principle:** Those responsible of data treatment shall facilitate the exercise of the right to information, excluding demands or requisites that may obstruct or impede such right.
- **Non-Discrimination Principle:** According to which, the responsible of data treatment shall give information to all those who request it, doing so under equal conditions and without making arbitrary distinctions.
- **Gratuity Principle:** According to which, access to information is free and no additional cost may be charged besides those related to information provision.
- **Celerity Principle:** This principle seeks agility in transactions and administrative management.

6. Duties of Mediimplantes S.A. as an Entity Responsible for Personal Data Treatment

Mediimplantes S.A., in compliance with legal principles related to Personal Data Treatment, informs Data Holders and Stakeholders that during the treatment of such data, duties ruled under Article 17 of Law 1581 of 2012 are to be complied with.

Whenever the Holder's provision of access to the Information Treatment Policy is not possible, Mediimplantes S.A. will inform through a Privacy Notice about the existence of such policies.

7. Personal Data Subject to Data Treatment

Mediimplantes S.A mainly treats personal information categorized under one of the following:
- Identification data
- Location data
- Sensible data
- Socioeconomic data
- Other data

Mediimplantes S.A may request additional (sensible) information, which can be freely and voluntarily provided by the Holder.

8. Personal Data Holders

Mediimplantes S.A's daily operations require knowing and treating personal data. Holders of said data can be:
- Patients
- Contractors
- Employees
- Event attendants
- Medical Staff
- Suppliers
- Petitioners
- Visitors

9. Purposes of Data Treatment

Mediimplantes S.A. will be able to perform the following tasks following previous authorization by the personal data Holder:
- Manufacture and commercialize implants and surgical instruments for patients with bone pathologies.
- Provide advising and technical support services for products acquired by specialized medical staff and used in surgical procedures for patients with bone pathologies.
- Communicate medical staff and health-providing institutions information regarding Mediimplantes S.A.'s goods and services.
- Carry out academic and corporate events, as well as publications in which information regarding products manufactured and commercialized by Mediimplantes S.A. is displayed to the public.

- Send information and commercial offers regarding products manufactured by Mediimplantes S.A., as well as performing marketing and/or commercialization activities of the goods and/or services that the company provides or could be able to provide or offer.
- Begin the selection and hiring process of staff, controlling the stages of job vacancy announcement, selection, staff news, and payroll updates for staff, SENA apprentices, and interns, as well as other procedures established for such purposes: interviews, application of entrance tests, entry and egress medical examinations, among others.
- Give process to unfitness permits, leaves, or other licenses for workers
- Fulfill corporate internal processes related to supplier and contractor administration.
- Develop the process of evaluation, verification, selection, and recruitment of suppliers and contractors. Likewise, managing all necessary communications during said process
- Carry out pre-judicial or judicial collection processes of pending obligations in favor of Mediimplantes S.A. either directly or through a third party.
- Allow for the entry, registration, control, and traceability of requests, complaints and claims presented to Mediimplantes S.A.
- Managing reports holding tributary or statistical information as well as any requirements asked by control, surveillance, or any other type of relevant competent entity, with whom Mediimplantes S.A. has any sort of compliance duty.
- Capturing video and photo evidence of any corporate event organized by Mediimplantes S.A.

Notwithstanding the previous information, any other additional information provided by the Holder or Holders is interpreted as accepted, considering the governing principles for personal data treatment established by the law. Such principles may be used by Mediimplantes S.A. in its role of responsible entity for data treatment for the purpose of development of functions inherent to the institution.

10. Personal Data Holder's Rights

In accordance with what is established by article 8 of Law 1581 of 2012, and decree 1377 of 2013, the Holder of personal data has the following rights regarding Mediimplantes S.A.:

a) Know, update, and rectify his or her personal data treated by Mediimplantes S.A., who acts in condition of responsible of said data treatment.
b) Request evidence of the authorization given to Mediimplantes S.A., in its condition of responsible of said data treatment
c) Be informed by Mediimplantes S.A., under previous request, regarding the use that it has given to his or her personal data
d) Revoke the authorization and/or request data suppression if principles, rights, and institutional and legal guarantees are not respected or complied with during data treatment.
e) Freely access personal data which has been subjected to treatment.

11. Sensible Data Treatment

In general, sensible data treatment is prohibited, with the exception of cases when:

a) The holder has given his or her explicit authorization for such treatment, except for the cases in which by law, such authorization is not required.

b) Treatment is necessary to safeguard the vital interests of the holder, and said holder is physically or legally incapacitated. In such cases, the legal representatives must give his or her authorization.

c) The treatment is done during the course of legitimate activities and with due guarantees by a foundation, NGO, association, or any other non-profit organization whose purposes are political, philosophical, religious, or syndical, as long as they refer exclusively to their members or to persons that keep regular contact due to such purposes. In these cases, data cannot be given to third parties without the holder's authorization.

d) When treatment refers to data that is necessary for the recognition, exercise, or defense of a right within a legal process.

e) When the treatment has historical, statistical, or scientific purposes. In such case, necessary means must be taken to suppress the identity of the holder or holders.

12. Treatment Children's and Teenagers' Data

In accordance to what is established in article 12 of statutory law 1581 of 2012, treatment of personal data belonging to children and adolescents is prohibited, with the exception of data that is public by nature and which fulfills the following parameters and requisites:

A) Data that responds to and respects the superior interests of children and adolescents

B) Data that ensures the respect of their fundamental rights.

All persons responsible and in charge of treatment of personal data belonging to children and adolescents must look after its appropriate use. For this purpose, the principles and obligations established by Law 1581 of 2012 and Decree 1377 of 2013 must be applied.

## 13. Means and Actions for the Exercise of Rights

Mediimplantes S.A., in compliance with the established by Law 1581 of 2012, discloses to the users the procedure to realize inquires and claims in the following manner:

A) INQUIRIES

The holders, their successors, or representatives may consult the holder's personal information that lies within any database. Therefore, Mediimplantes S.A., as responsible entity of such data treatment, will provide them with all the information contained within the individual registry or that which is linked to the identification of the Holder.

Mediimplantes S.A. guarantees the means of electronic communication for the formulation of queries. Such means will be the same ones used for the reception and caretaking of petitions, complaints, and claims administered by the entity's officials in charge of attending external requests. The query will be responded to within a maximum of ten (10) business days, counted beginning on the query's date of reception.

If such term is to expire without an answer to a query being possible, Mediimplantes S.A., as responsible for data treatment, will inform the interested party regarding the motives behind the delay and will give a date by which the query must be answered. Such date must not exceed five (5) business days following the expiry of the first term. The following diagram illustrates the query procedure:
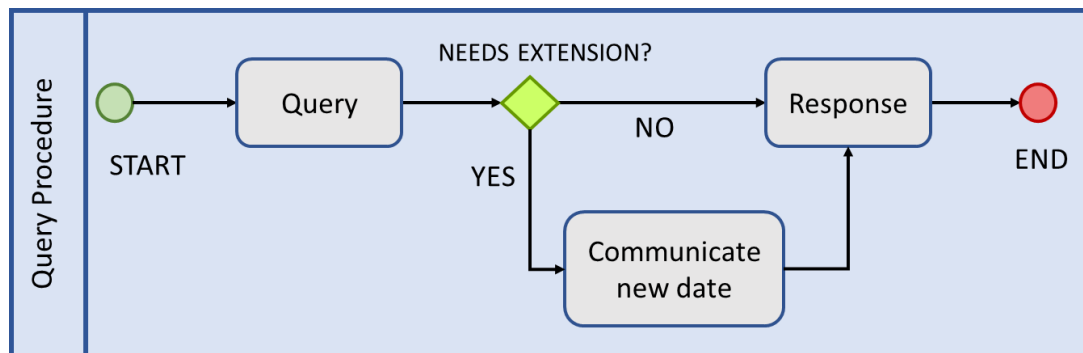
B) CLAIMS

Claims will be attended within a maximum period of fifteen (15) business days starting from the date following their receipt. Mediimplantes S.A. may extend such term in special cases, giving notice to the interested party. This new term may not exceed eight (8) subsequent business days. The following diagram illustrates the procedure:
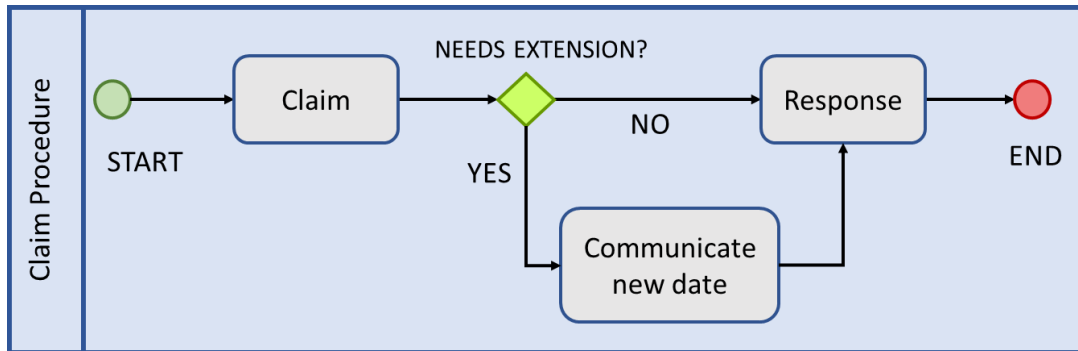
C) ATTENTION CHANNELS

The following channels are provided to attend inquiries, claims, and complaints:
- Personal (face to face) attention point: Parque Industrial Bucaramanga Manz. C Bod. 10, Bucaramanga, Colombia
- Virtual
  - *'Contact Us' Channel:* www.mediimplantes.com
  - Customer Support- PQRS-: www.mediimplantes.com
- E-mail: sqr@mediimplantes.com

14. Image Capture Through Video Surveillance Cameras

Mediimplantes S.A. may use diverse means of video surveillance throughout its interior and exterior premises. Therefore, the existence of such mechanisms is informed through the display of video surveillance signs in visible areas. Such signs will at least contain information regarding those responsible for data treatment, their contact details, the type of treatment that such data is subject to, as well as its purposes shall be disclosed. Also, data holders' rights as well as where to find the personal data treatment policy will be displayed. Such signs will be placed strategically in easy-to-find areas. The video surveillance system will not inspect areas in which the holder's intimacy has uppermost importance.

The system is used to look after the security of both people and premises. Such information may be employed as evidence in any kind of process in which administrative or legal authorities are involved, while always seeking compliance with any applicable norms.

15. Person or Group Responsible for Query, Request, Claim, and Complaint Handling

The department in charge of responding to Requests, Complaints, and Claims regarding personal data treatment is the area known as Management Control, which will receive such requests through the following E-mail address: sqr@mediimplantes.com

16. Validity of the Personal Data Treatment Policy

All guidelines contained within this policy will valid beginning on September 2018 and leaving any previously adopted Personal Data Treatment Policy without any further effect.

17. Database Validity

All databases containing holders' information who possess any contractual relationships or must stay for legal reasons, will remain valid until the need for data treatment is concluded. This, however, applies without any detriment to the suppression rights that the Holder is entitled to.

18. Changes and Modifications

Any substantial changes or modifications made to this policy after the beginning of its validity, will be communicated to the Holder with a ten (10) days' notice before their implementation. Such notification may be emitted through the best-fit means of communication, such as e-mails or within the physical premises of Mediimplantes S.A.

This policy is valid beginning on November 14, 2018

RICARDO ALBERTO AZUERO GONZALEZ
General Manager