

PRIVACY POLICY

(PERSONAL DATA PROCESSING POLICY)

QUINTERO HERMANOS S.A.S. (SICEX)

1. IDENTIFICATION OF THE DATA CONTROLLER

- **Corporate Name:** QUINTERO HERMANOS S.A.S. (hereinafter, “THE COMPANY” or “SICEX”).
- **Tax ID (NIT):** 860.009.323-5.
- **Registered Domicile:** Bogotá D.C., Colombia.
- **Address:** Carrera 29 No. 39a - 22.
- **Data Protection Email:** habeasdata@sicex.com
- **Telephone:** (57) (1) 794 6488

2. PURPOSE AND SCOPE

This Policy sets out the guidelines under which THE COMPANY carries out the processing of personal data, ensuring compliance with the constitutional right of habeas data, Statutory Law 1581 of 2012 (Ley Estatutaria 1581 de 2012, Colombia’s data protection statute), Sole Regulatory Decree 1074 of 2015 (Decreto Único Reglamentario 1074 de 2015) and other applicable regulations. This Policy applies to all databases managed by THE COMPANY in its capacity as Data Controller.

3. LEGAL DEFINITIONS

For the interpretation of this Policy, the definitions set forth in Article 3 of Law 1581 of 2012 are adopted, with particular emphasis on the following:

- **Public Data:** Any data that is not semi-private, private or sensitive. Public data includes, among others, data relating to the civil status of individuals, their profession or trade, and their status as a merchant or public servant, as well as data contained in public registries, public documents, official gazettes and bulletins, and judicial decisions. The public nature of the data does not authorize its indiscriminate use; its processing remains subject to the principles of Law 1581 of 2012 (purpose, freedom, transparency, restricted access and circulation, security and confidentiality).
- **Transfer:** The sending of data to a recipient (a Data Controller) who makes decisions regarding the database (e.g., the sale of databases to third parties).
- **Transmission:** The communication of data to a Data Processor so that it may carry out processing on behalf of THE COMPANY (e.g., a cloud or software provider).

4. PURPOSES OF PROCESSING

THE COMPANY collects, stores, uses and circulates personal data for the following lawful purposes:

4.1. General Purposes (Clients, Suppliers, Employees):

- Performance of the contractual, commercial or employment relationship.
- Invoicing, accounting and tax management.

- Handling of requests, complaints and claims (PQR, for its Spanish acronym).
- Security of facilities (video surveillance and access control).

4.2. Specific Purposes of the Business Model (Foreign Trade Information): THE COMPANY collects, processes and commercializes information obtained from publicly accessible sources (e.g., import/export declarations, transport documents, public registries). With respect to **personal data** that may be incidentally contained in such public sources (e.g., the name of a legal representative or customs declarant):

- Processing for purposes of commercial intelligence, statistics and market analysis.
- Publication on the SICEX product platforms for consultation by subscribers, on the basis of the public nature of the data (Article 10 of Law 1581 of 2012).

4.3. Marketing and Prospecting Purposes:

- Sending of commercial information regarding SICEX products, newsletters, events and promotions, provided that **prior and express authorization** exists or there is an ongoing commercial relationship, in accordance with Decree 1074 of 2015.

5. RIGHTS OF DATA SUBJECTS

Any natural person whose data is processed by THE COMPANY has the right to:

- Know, update and rectify their personal data.
- Request proof of the authorization granted (except in the case of public data).
- Be informed about the use that has been made of their data.
- File complaints before the Superintendence of Industry and Commerce (Superintendencia de Industria y Comercio – SIC).
- Revoke the authorization and/or request the deletion of the data where constitutional or legal principles are not respected.
- Access their personal data free of charge.

6. PROCESSING OF SENSITIVE DATA AND DATA OF MINORS

THE COMPANY refrains from processing sensitive data (racial origin, health, biometrics, trade union membership), unless strictly necessary for the employment relationship or legal compliance, and always with explicit authorization. **Prohibition:** No data of children and adolescents is collected, except for data of a public nature or in the context of employee benefits, always respecting the best interests of the minor.

7. AUTHORIZATION

The processing of private or semi-private data requires the **prior, express and informed** authorization of the Data Subject. THE COMPANY has eliminated any mechanism of “tacit consent” or consent by silence. Authorization shall be obtained through checkboxes, physical or electronic signature, or other unequivocal means. **Exception:** No authorization is required for the processing of data of a public nature (e.g., customs records).

8. INTERNATIONAL TRANSFER AND TRANSMISSION

THE COMPANY may transfer or transmit data to third countries for the fulfillment of its corporate purpose (e.g., cloud servers or international clients). In such cases, THE COMPANY will ensure that the receiving country offers adequate levels of protection, or will execute the data transmission/transfer agreements required by the SIC.

9. PROCEDURE FOR HANDLING DATA SUBJECT REQUESTS (INQUIRIES AND CLAIMS)

The area responsible for handling requests is the **Administrative and Financial Management Office** (Gerencia Administrativa y Financiera) or such role as may be designated.

- **Authorized Channel:** Email habeasdata@sicex.com.
- **Inquiries:** Will be resolved within a maximum term of ten (10) business days.
- **Claims (Correction, Update, Deletion):** Must include the identification of the data subject, a description of the facts giving rise to the claim, and an address for notifications. They will be resolved within fifteen (15) business days.
- **Procedural Requirement:** The Data Subject may only file a complaint before the SIC once the inquiry or claim procedure before THE COMPANY has been exhausted.

10. EFFECTIVENESS AND AMENDMENTS

This Policy is effective as of its publication. Databases will remain in force for as long as the purpose for which the data was collected subsists, or for as long as a legal duty to retain the data exists. Any substantial change will be communicated through the website www.sicex.com prior to its implementation. In addition: (i) the Privacy Notice will be made available at data collection points; (ii) data will be retained only for the time necessary for the stated purposes and/or as required by legal or contractual duty, and will thereafter be securely deleted or anonymized; (iii) where applicable, the registration and updating of databases in the National Database Registry (RNBD) and the reporting of updates and incidents to the SIC will be managed; and (iv) evidence of compliance will be retained (database inventory, authorizations/notices, transmission agreements, security controls and verifications).

11. LANGUAGE

This document is an English translation of the Personal Data Processing Policy of QUINTERO HERMANOS S.A.S. (SICEX), originally issued in Spanish, provided for convenience and informational purposes. In the event of any discrepancy or conflict of interpretation between the Spanish version and this English translation, the Spanish version shall prevail.

Version 1.0 – Effective as of January 29, 2026. This version supersedes and replaces in its entirety the Policy dated October 5, 2016 and any prior version.