



PROCESSING OF PERSONAL INFORMATION PRIVACY POLICY

1 GOAL:

Ensure, on behalf of the "Banacol Group" companies, proper information processing of employees, customers, suppliers, producers, partners, service providers, those in cooperation and communities benefiting from social benefit programs, among others; as well as the rights of those that assist information bearers.

2 REACH:

The scope of this policy involves all affiliated companies that are part of Banacol, hereinafter "Banacol Group", which collect, process, consult, store, transfer and report personal information of employees, customers, suppliers, producers, partners, service providers, among others; within the normal operation of their activities or functions. For the purposes of this policy, its scope involves the following companies, included within the Banacol Group concept:

Company Name	Tax ID Number
C. I. Banacol S. A.	890.926.766-7
Sanidad Vegetal S. A. S.	890.942.224-4
Agrícola el Retiro S. A. S.	800.059.030-8
Expobán S.A.S.	860.070.512-9
Agrícola el Carmen S. A. S.	890.940.677-8
Ríocedro S. A. S.	800.073.566-1
El Convite S. A. S.	800.073.563-1
Centurión S. A. S.	800.073.573-3
Banalogistic S. A.	890.926.162-9
Compañía Frutera de Sevilla LLC	860.008.820-1

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Fundación Social Banacol Corbanacol	800.023.087-1
Fondo de empleados Banacol S. A. Banafé	900.103.234-4

3 RESPONSIBILITY:

For all cases, the person responsible is the natural or legal person, public or private, who of his or her own accord or in partnership with others, decides on the basis of information and / or the processing of information. For specific cases they will relate as follows: C.I. Banacol S.A., Sanidad Vegetal S.A.S., Agrícola el Retiro S.A.S., Agrícola el Carmen S.A.S., Exportadora de Banano S.A.S, Ríocedro S.A.S., El Convite S.A.S., Centurión S.A.S., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Banalogistic S.A., Compañía Frutera de Sevilla LLC., Fundación Social Banacol Corbanacol, Banacol Employees Fund S.A., Banafé, companies domiciled in the municipality of Envigado – Antioquia, its headquarters is located at Calle 26 Sur No. 48-12, website: www.banacol.com, and email protecciondatospersonales@banacol.com.co, telephone (4) 3396262.

4 POLICIES:

This policy is issued in compliance with the National Constitution, Law 1581 of 2012, Regulatory Decree 1377 of 2013, 886 of 2014, and other norms that apply in this area. The following describes the policy approved by the Banacol Group related to the processing of personal information and privacy notice, which has been collected during its contractual relationship with customers, suppliers, producers, employees, partners, contractors, co-operators, or those collected in the development of charitable programs, and all those with whom it has or has had any business or employment relationship , in order to obtain truthful, relevant, complete, up-to-date and accurate information from the bearer.

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5 DEVELOPMENT:

Personal information provided to the Banacol Group may be processed, collected, stored, used, circulated, deleted, shared, updated, transferred and transmitted to countries that guarantee the appropriate levels for data protection.

The above is in accordance with the terms and conditions as applicable and in compliance with the privacy policies provided for by law. This information will be used by the Banacol Group to facilitate the provision of its services and in accordance with its social purpose, as well as for labor, administrative, accounting, tax, commercial and advertising purposes, and with the purpose of contacting the information bearers.

The personal information collected will only be used for the purposes established in the respective privacy notices or data processing authorizations, made available to the Bearers in order to authorize its processing. However, databases may also be used for the following purposes:

- For sending information to its employees, customers, suppliers, producers, shareholders, contractors, co-operators, communities benefiting from social programs and in general to all those persons and/or companies with whom the Banacol Group may have a commercial or legal relationship;
- To manage and control payrolls, general social security system affiliations, wellbeing activities and occupational health. Likewise, manage and operate, directly or through third parties, the processes of selection and hiring of personnel, including the evaluation and qualification of participants, verification of work and personal references, and background checks and registration of fingerprints, in those cases which required it;
- Establish contractual relationships with customers, suppliers and contractors that allow the acquisition of goods and services that the Banacol Group requires for its normal operation;
- To determine outstanding obligations, consultation of financial information and credit history and reports of unfulfilled obligations, in regards to their debtors;
- Meeting requirements made by public or administrative entities, exercising their legal functions and/or by court order;

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- In response to inquiries, requests and complaints made by bearers and to give Personal Information to official entities and other authorities that can receive Personal Information, under applicable law;
- Strengthening relationships with suppliers, producers and customers, by sending relevant information of interest;
- Notify authorized contacts in case of an emergency during working hours or when working;
- To eventually contact, via email, or any other way, persons with whom the Banacol Group has or has had a relationship, such as employees, former employees and their relatives, shareholders, customers, suppliers, producers, creditors and debtors;
- Interacting with customers, suppliers, employees, former employees, contractors, co-operators, and communities benefiting from social programs, verifying compliance with their legal obligations and the invitation to events organized or sponsored by the Banacol Group;
- Register customers, suppliers and contractors in Banacol Group systems and process their payments;
- For marketing, communication, statistics, research and other commercial activities that do not break any current Colombian laws;
- Transfer of gathered information to different areas of the Banacol Group, in Colombia and abroad, when necessary for the development of its operations and payroll management (bill collection and administrative collections, treasury and accounting);
- Fraud control and prevention;
- Money laundering and terrorism financing Prevention and Control;
- Control access to Banacol Group offices and establish security measures, including the video-monitored areas;
- Any other activity similar to those described above, that is necessary for Banacol Group's social and/or corporate objective.

5.1 Obligations of the person responsible for personal information

- To fully and comprehensively inform customers, suppliers, producers, employees and all those with whom there is or has been any commercial or employment relationship, about this Banacol Group Personal Information Processing Policy, that complies with the Law and guarantees all parties' rights;

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- Maintain the reported information in the Database, up to date during the terms of the contract;
- Inform titleholders of the transfer and transmission of database information to duly authorized third parties, complying with legal protection standards, as determined by the Law or the Industry and Commerce Superintendent;
- Send via email or normal mail: (i) product updates, (ii) relevant information or announcements relevant to the company, (iii) invitations to company or third party events, (iv) communications in general, (v) offers and contracts, among others.
- The Banacol Group may manage the gathering, processing, managing and updating of the Databases through third parties, who in each case must follow current policy, for which a confidentiality agreement (NDA) will be signed which will guarantee the security and proper handling of all information.

5.2 Obligations of those responsible for protecting personal information.

The Banacol Group will treat the information correctly, which in any case will be limited to the reasons for which it was given, agreeing to correctly treat the data from its gathering, storage, use and final disposal/erasing; preventing unauthorized third party access that would allow violation, modification, disclosure and / or destruction of the information in the Banacol Group databases; this will also ensure that security protocols comply with the necessary control measures to minimize loss, abuse or changes in information.

5.3 Titleholder's Rights.

Persons whose Personal Information is processed by the Banacol Group, shall have the rights provided for in the Colombian Political Constitution, Law 1581 of 2012 and its regulatory decrees, and in particular may:

- See the Personal Information on which the Banacol Group is carrying out the Processing. Likewise, the bearer may request at any time that his or her data be updated or rectified;
- Request proof of the authorization that was granted to the Banacol Group for the Processing of their Personal Information;
- Be informed by the Banacol Group, upon request, of the use being given to their Personal Information;

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- File complaints with the Industry and Commerce Superintendent for violations of the Provisions of the Personal Data Protection Act;
- Request that Banacol Group delete your Personal Data and/or revoke the authorization granted for the Processing thereof, in accordance with the procedures established in Banacol Group’s Personal Data Protection Policy. It is important to note that the request for deletion of the information and the suspension of the authorization will not proceed when the Information Bearer has a legal or contractual duty to remain in the Database and/or files, or while the relationship between the bearer and the Banacol Group, under which his data was collected, is still in force;
- Have free access to their Personal Information subject to Processing;
- Refrain from answering questions about sensitive information. Answers about children and teenagers and those related to health information will be optional.

5.4 Attention for the reception and response of requests, queries and complaints (PCR) of the titlebearers of the personal information.

The (title) bearer of the information has the right to submit Petitions, Consultations and Claims, hereinafter PCC (PCR in Spanish), in writing, which will contain the following information: (i) Addressed to the Banacol Group, to the email protecciondatospersonales@banacol.com.co, the headquarters located at Calle 26 Sur No. 48-12, Envigado, Colombia; (ii) The following data: name, identification number, address, contact number and email address of the Bearer; (iii) The documents with which you intend to support your PCC; and, (iv) The clearly determined facts on which the application is based.

- **For Claims:** The Banacol Group will respond within fifteen (15) business days from the day following the date of receipt of the PCC. In the event the Banacol Group cannot respond to the PCC within that period, the petitioner must be informed of this, giving the reasons for the delay and expressly indicating the date on which the response will be given or resolved; which in any case may not exceed eight (8) business days following the expiration of the first date.
- **For Inquiries:** The Banacol Group will respond within ten (10) business days from the date of receipt of the PCC. In the event the Banacol Group cannot respond the PCC within that

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period, this must be reported to the petitioner, giving the reasons for the delay and expressly indicating the date on which his or her consultation will be attended; which in any case, may not exceed five (5) business days following the expiration of the first date.

- **Request for updating and/or correction:** The Banacol Group shall rectify and update, at the request of the bearer, the bearer's information that turns out to be incomplete or inaccurate, in accordance with the procedure and the terms indicated above, for which it shall be taken into account:

The bearer must make the request at the e-mail protecciondatospersonales@grupobanacol.com.co, or in printed and addressed to the Personal Data Protection Officer indicating the update and / or rectification to be made and must provide the documentation that supports his request;

- The Banacol Group may enable mechanisms to facilitate this right of the bearer, provided they have it. Accordingly, electronic or other means that it deems relevant may be enabled, which will be in the privacy notice and made available to those interested, on the website.

- **Request for deletion of information:** The bearer of the personal information has the right to request that Banacol Group delete it in any of the following circumstances:

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- They consider that they are not being treated in accordance with the principles, duties and obligations provided for in current regulations;
- They are no longer necessary or relevant to the purpose for which they were collected;
- The period necessary for the fulfillment of its purpose, for which they were requested, has been finished. This deletion implies the total or partial deletion of personal information, as requested by the bearer in the records, files, databases or treatments carried out by the Banacol Group. However, this right of the bearer is not absolute and therefore the Banacol Group may deny this, when: (i) The bearer has a legal or contractual duty to remain in the database; or (ii) The deletion of data impedes judicial or administrative actions linked to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions. (iii) The information is necessary to protect the legally protected interests of the owner, to take an action in public interest, or to comply with an obligation legally acquired by the owner.

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- The bearer agrees that the decisions taken by the Banacol Group, within the process of a PCC, will be made by the responsible through an e-mail.

5.5 Information on Minors

In the event that Those Responsible carry out Sensitive Information processing, it is guaranteed that the authorization for the use of such information will be obtained in advance and expressly, meeting the following obligations:

- The Subject of the Information will be informed that because it is sensitive information, they are not obligated to authorize its processing.
- The Bearer will be informed in advance and expressly, what the sensitive information is and what the purpose of the processing will be.
- Especially in the case of minors, their legal representatives may give authorization upon using the minor's right to be heard.

1.1 Substantial policy changes

Any substantial changes, updates, deletions or rectifications contemplated in this policy, will be informed, prior to implementation, to the Bearers of Personal Information, through the Banacol website in the section *who we are*, and within the Group through the Intranet, to inform the change made to the intermediaries, suppliers and corresponding third parties. In addition, any means that allow the efficient reporting of this change may be used. The Banacol Group reserves the right to modify the Personal Information Protection Policy at any time.

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This policy is in effect as of the date of issue and repeals all prior regulations and instructions contrary to it.

6 ANNEX:

Not applicable.

7 CHANGE CONTROLS:

IN EFFECT AS OF	TYPE OF CHANGE
mayo de 2019	V – 00 Meeting Decree of Law 1581 of 2012
<u>YEAR-MONTH-DAY</u>	Explain why the change was made
<u>YEAR-MONTH-DAY</u>	Explain why the change was made
<u>YEAR-MONTH-DAY</u>	Explain why the change was made

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