PERSONAL DATA PROCESSING POLICY

1. LEGAL REGULATIONS AND SCOPE OF APPLICATION:

The present policy of Treatment of Personal Data is prepared in accordance with the provisions of the Political Constitution, Law 1581 of 2012, the Regulatory Decree 1377 of 2013 and other complementary provisions and will be applied by QUICK GO S.A.S., regarding the collection, storage, use, circulation, suppression and all those activities that constitute treatment of personal data.

2. DEFINITIONS:

For the purposes of this policy and in accordance with legal regulations, the following definitions shall apply:

1. **Authorization**: Prior, express and informed consent of the Data Subject to carry out the Processing of personal data;

2. **Privacy Notice**: A physical, electronic or any other format document generated by the Controller that is made available to the Data Subject for the processing of his/her personal data. The Privacy Notice communicates to the Data Subject the information regarding the existence of the information processing policies that will be applicable to him/her, how to access them and the purpose of the processing that is intended to be given to the personal data;

3. **Database**: Organized set of personal data that is subject to Processing;

4. **Personal data**: Any information linked or that can be associated to one or several determined or determinable natural persons;

5. **Public data**: Data qualified as such according to the provisions of the law or the Political Constitution and that which is not semi-private, private or sensitive. Public data includes, among others, data relating to the marital status of individuals, their profession or trade, their status as merchants or public servants, and data that may be obtained without any reservation whatsoever. By their nature, public data may be contained, among others, in public records, public documents, gazettes and official bulletins;

6. **Private data**: Data that, due to its intimate or reserved nature, is only relevant to the owner;
7. **Sensitive data**: Sensitive data are understood as those that affect the privacy of the Data Subject or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life and biometric data;

8. **Data Processor**: Natural or legal person, public or private, that by itself or in association with others, performs the Processing of personal data on behalf of the Data Controller;

9. **Data Controller**: Natural or legal person, public or private, who by himself or in association with others, decides on the database and/or the processing of the data;

10. **Data Subject**: Natural person whose personal data is the object of processing;

11. **Processing**: Any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion of such data.

### 3. PURPOSE FOR WHICH THE COLLECTION AND PROCESSING OF PERSONAL DATA IS CARRIED OUT:

**QUICK GO S.A.S.** may use personal data to:

1. Execute the existing contractual relationship with its customers, suppliers and employees, including the payment of contractual obligations;
2. To provide the services and/or products required by its users;
3. To inform about new products or services and/or changes in them;
4. Evaluate the quality of the service;
5. Conduct internal studies on consumption habits;
6. Send to the physical mail, electronic mail, cell phone or mobile device, via text messages (SMS and/or MMS) or through any other analog and/or digital means of communication created or to be created, commercial, advertising or promotional information about the products and/or services, events and/or promotions of commercial or non-commercial nature of these, in order to promote, invite, direct, execute, inform and in general, carry out campaigns, promotions or contests of commercial or advertising nature, advanced by **QUICK GO S.A.S.**, and/or by third parties;
7. To develop the selection, evaluation and employment process;
8. Support internal or external audit processes;
9. Register the information of employees and/or pensioners (active and inactive) in the databases of **QUICK GO S.A.S.**; i) Those indicated in the authorization
10. Provide, share, send or deliver your personal data to QUICK GO S.A.S. subsidiaries, affiliates or subordinate companies, located in Colombia or any other country in the event that such companies require the information for the purposes indicated herein.

Regarding the data (i) collected directly at security points, (ii) taken from documents provided by individuals to security personnel and (iii) obtained from video recordings made inside or outside QUICK GO S.A.S. facilities, these will be used for security purposes of people, goods and facilities of QUICK GO S.A.S. and may be used as evidence in any type of process. If a personal data is provided, such information will be used only for the purposes stated herein, and therefore, QUICK GO S.A.S., will not proceed to sell, license, transmit, or disclose the same, unless: (i) there is express authorization to do so; (ii) it is necessary to allow contractors or agents to provide the services entrusted; (iii) it is necessary in order to provide our services and/or products; (iv) it is necessary to disclose it to entities that provide marketing services on behalf of QUICK GO S.A.S., or other entities with which we have joint marketing agreements; (v) the information is related to a merger, consolidation, acquisition, divestiture, or other corporate restructuring process; (vi) it is required or permitted by law. QUICK GO S.A.S., may subcontract to third parties for the processing of personal information or providing personal information to third party service providers, QUICK GO S.A.S., warns such third parties about the need to protect such personal information with appropriate security measures.

4. PRINCIPLES APPLICABLE TO THE PROCESSING OF PERSONAL DATA:

The treatment of personal data in QUICK GO S.A.S., will be governed by the following principles:

1. **Principle of purpose**: The processing of personal data collected must obey a legitimate purpose, which must be informed to the Data Subject;

2. **Principle of freedom**: Processing may only be carried out with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or judicial mandate that relieves consent;

3. **Principle of truthfulness or quality**: The information subject to processing must be truthful, complete, accurate, updated, verifiable and understandable. Partial, incomplete, fractioned or misleading data will not be processed;
4. **Principle of transparency:** The right of the Data Subject to obtain from QUICK GO S.A.S., at any time and without restrictions, information about the existence of data concerning him/her, must be guaranteed in the Processing;

5. **Principle of restricted access and circulation:** Processing is subject to the limits derived from the nature of the personal data, the provisions of this law and the Constitution. Personal data, except for public information, and as provided in the authorization granted by the owner of the data, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the Owners or authorized third parties;

6. **Security principle:** The information subject to processing by QUICK GO S.A.S., shall be protected through the use of technical, human and administrative measures that are necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access;

7. **Principle of confidentiality:** All persons involved in the processing of personal data are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks involved in the processing.

**FIRST PARAGRAPH:** In the event that sensitive personal data is collected, the Data Subject may refuse to authorize its processing.

**5. PERSON RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA:**

In accordance with Law 1581 of 2012 and its Regulatory Decree 1377 of 2013, the following information regarding the person responsible for the processing of personal data is set forth:

1. Company name of the data controller: **QUICK GO S.A.S.** with NIT. 901.013.238-0, Address of the data controller: Tv. 93 No. 51-98 Und. 24 y 25 Bogotá, Colombia
2. Email address of the data controller: sac@quick.com.co
3. Telephone number of the person in charge of treatment: +571 7470547
4. Period of validity of the database: All information collected about users will be stored by the data controller (**QUICK GO S.A.S.**) for a period of 5 years, counting from the same day the information is provided. After five (5) years it will be deleted by the data controller.

**6. RIGHTS OF THE HOLDERS OF PERSONAL DATA PROCESSED BY QUICK GO S.A.S.:**
The owners of personal data by themselves or through their representative and/or proxy or their successor in title may exercise the following rights with respect to the personal data that are processed by **QUICK GO S.A.S.**:

1. Right of access: By virtue of which you may access the personal data under the control of **QUICK GO S.A.S.**, for the purpose of consulting them free of charge at least once every calendar month, and each time there are substantial modifications to the Policies of Treatment of information that motivate new consultations;

2. Right to update, rectification and suppression: By virtue of which you may request the update, rectification and/or suppression of the personal data being processed, in such a way that the purposes of the processing are satisfied;

3. The right to request proof of authorization, except in the events in which, according to the legal regulations in force, authorization is not required to carry out the processing;

4. Right to be informed regarding the use of personal data;

5. Right to file complaints before the Superintendence of Industry and Commerce for violations of the provisions of the current regulations on the treatment of personal data;

6. Right to require compliance with the orders issued by the Superintendence of Industry and Commerce.

To revoke at any time the authorization of personal data granted to the data controller, provided that there is no legal or contractual duty to remain in the database.

**SENSITIVE DATA OF CHILDREN AND ADOLESCENTS**, in the event that data of minors is received, the company will follow the parameters established by the regulations. It is made clear that the handling of data of minors will always be done for their benefit and in any case with respect for the best interests of children and adolescents and their fundamental rights. **QUICK GO S.A.S.**, as far as possible, does not process sensitive data, however, if required, has established the possibility for the owner of the data not to respond to questions or circumstances that may involve this category of data.

**FIRST PARAGRAPH**: For the purposes of exercising the rights described above, both the holder and the person representing the holder must prove their identity and, if applicable, the capacity by virtue of which they represent the holder.
SECOND PARAGRAPH: The rights of minors shall be exercised through the persons empowered to represent them, who shall be the guarantor of the defense of their rights.

7. DUTIES OF QUICK GO S.A.S.:

All those obliged to comply with this policy must be aware that QUICK GO S.A.S. is obliged to comply with the duties imposed by law in this regard. Consequently, the following obligations must be complied with: A. Duties when acting as responsible: (i) Request and keep, under the conditions provided in this policy, a copy of the respective authorization granted by the holder. (ii) Clearly and sufficiently inform the holder about the purpose of the collection and the rights he/she has by virtue of the authorization granted. (iii) Inform at the request of the holder about the use given to their personal data (iv) Process inquiries and claims made under the terms set forth in this policy (v) Ensure that the principles of accuracy, quality, security and confidentiality in the terms set forth in the following policy (vi)-Conserve the information under the security conditions necessary to prevent adulteration, loss, consultation, use or unauthorized or fraudulent access. (vii) Update the information when necessary. (viii) Rectify the personal data when appropriate. B. Duties when acting as Data Processor. If the data processing is carried out on behalf of another entity or organization (Data Controller), it must comply with the following duties: (i) Establish that the Data Controller is authorized to provide the personal data that it will process as Data Processor (ii) Guarantee the holder, at all times, the full and effective exercise of the right of habeas data. (iii) Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access. (iv) Update, rectify or delete the data in a timely manner. (v) Update the information reported by the Data Controllers within five (5) business days from its receipt. (vi) Process the queries and claims made by the owners under the terms set forth in this policy. (vii) Register in the database the legend "claim in process" in the manner established in this policy. (ix) Insert in the database the legend "information under judicial discussion" once notified by the competent authority about judicial processes related to the quality of the personal data. (x) Refrain from circulating information that is being disputed by the owner and whose blocking has been ordered by the Superintendence of Industry and Commerce. (xi) Allow access to the information only to persons authorized by the owner or empowered by law for such purpose. (xii) Inform the Superintendence of Industry and Commerce when there are violations to the security codes and there are risks in the administration of the information of the owners. (xiii) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce. C. Duties when processing is carried out through a Data Processor (i) To
provide the Data Processor only with the personal data whose processing is previously authorized. For the purposes of national or international transmission of data, a contract for the transmission of personal data must be signed or contractual clauses must be agreed in accordance with the provisions of Article 25 of Decree 1377 of 2013. (ii) Ensure that the information provided to the Data Processor is truthful, complete, accurate, updated, verifiable and understandable. (iii) Communicate in a timely manner to the Data Processor all developments regarding the data previously provided and take other necessary measures to ensure that the information provided to the Data Processor is kept updated. (iv) Inform the Data Processor in a timely manner of any corrections made to the personal data so that it may proceed to make the pertinent adjustments. (v) Demand that the Data Processor, at all times, respect the security and privacy conditions of the data owner’s information. (vi) Inform the Data Processor when certain information is under discussion by the data owner, once the claim has been filed and the respective process has not been completed. D. Duties with respect to the Superintendency of Industry and Commerce (i) Inform it of any violations to the security codes and the existence of risks in the administration of the information of the owners. (ii) Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

The transfer of personal data of any kind to countries that do not provide adequate levels of data protection is prohibited. It is understood that a country offers an adequate level of data protection when it complies with the standards set by the Superintendence of Industry and Commerce on the matter, which in no case may be lower than those required by this law to its recipients.

This prohibition shall not apply in the case of:

1. Information with respect to which the Data Subject has given express and unequivocal authorization for the transfer;
2. Exchange of medical data, when so required by the Data Controller’s treatment for reasons of health or public hygiene;
3. Bank or stock exchange transfers, in accordance with the applicable legislation;
4. Transfers agreed within the framework of international treaties to which the Republic of Colombia is a party, based on the principle of reciprocity;
5. Transfers necessary for the execution of a contract between the Data Subject and the Data Controller, or for the execution of pre-contractual measures as long as the authorization of the Data Subject is obtained;
6. Transfers legally required to safeguard the public interest, or for the recognition, exercise or defense of a right in a judicial proceeding.
8. REQUEST FOR AUTHORIZATION TO THE HOLDER OF THE PERSONAL DATA:

Prior to and/or at the time of collecting the personal data, QUICK GO S.A.S. will request the data owner's authorization to collect and process the data, indicating the purpose for which the data is requested, using automated technical means, written or oral, that allow preserving proof of the authorization and/or the unequivocal conduct described in article 7 of Decree 1377 of 2013. Such authorization shall be requested for the time that is reasonable and necessary to meet the needs that gave rise to the request for the data and, in any case, in compliance with the legal provisions governing the matter.

9. PRIVACY NOTICE:

In the event that QUICK GO S.A.S., cannot make available to the holder of the personal data the present policy of treatment of the information, it will publish the privacy notice that is attached to the present document, whose text will be kept for later consultation by the holder of the data and/or the Superintendency of Industry and Commerce.

10. TIME LIMITATIONS ON THE PROCESSING OF PERSONAL DATA:

QUICK GO S.A.S., may only collect, store, use or circulate personal data for the time that is reasonable and necessary, according to the purposes that justified the treatment, taking into account the provisions applicable to the matter in question and the administrative, accounting, fiscal, legal and historical aspects of the information. Once the purpose or purposes of the processing have been fulfilled, and notwithstanding any legal provisions to the contrary, the personal data in its possession shall be deleted. Notwithstanding the foregoing, personal data must be retained when required for compliance with a legal or contractual obligation.

11. RESPONSIBLE AREA AND PROCEDURE FOR THE EXERCISE OF THE RIGHTS OF THE HOLDERS OF PERSONAL DATA:

The ADMINISTRATIVE AREA of QUICK GO S.A.S., will be responsible for handling requests, complaints and claims made by the owner of the data in exercise of the rights referred to in paragraph 5 of this policy, with the exception of the one described in paragraph e). For such purposes, the holder of the personal data or whoever exercises his representation may send his request, complaint or claim to our offices or through our website.
The petition, complaint or claim must contain the identification of the Holder, the description of the facts that give rise to the claim, the address, and accompanying documents to be asserted. If the claim is incomplete, the interested party will be required within five (5) days after receipt of the claim to correct the faults. After two (2) months from the date of the requirement, without the applicant submitting the required information, it will be understood that the claim has been abandoned. In the event that the person receiving the claim is not competent to resolve it, he/she will transfer it to the appropriate person within a maximum term of two (2) business days and will inform the interested party of the situation. Once the complete claim has been received, a legend will be included in the database stating “claim in process” and the reason for the claim, within a term not exceeding two (2) business days. Such legend shall be maintained until the claim is decided. The maximum term to address the claim shall be fifteen (15) business days from the day following the date of receipt. When it is not possible to address the claim within such term, the interested party shall be informed of the reasons for the delay and the date on which the claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

12. SECURITY MEASURES:

In development of the security principle established in Law 1581 of 2012, QUICK GO S.A.S., will adopt the technical, human and administrative measures that are necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access. The personnel who carry out the processing of personal data will execute the protocols established in order to ensure the security of the information.

13. LAW AND JURISDICTION:

Any interpretation, judicial or administrative action derived from the processing of personal data shall be subject to the personal protection rules established in the Republic of Colombia and the competent administrative or jurisdictional authorities for the resolution of any concern, complaint or claim regarding the same shall be those of the Republic of Colombia.

14. EFFECTIVE DATE:

This Personal Data Policy is effective as of June 1, 2018.

15. PRIVACY NOTICE
15.1 PURPOSE FOR WHICH THE COLLECTION AND PROCESSING OF PERSONAL DATA IS CARRIED OUT:

QUICK GO S.A.S., may use personal data to:

1. Execute the existing contractual relationship with its customers, suppliers and employees, including the payment of contractual obligations;
2. To provide the services and/or products required by its users;
3. To inform about new products or services and/or changes in them;
4. Evaluate the quality of service;
5. Conduct internal studies on consumption habits;
6. Send to the physical mail, electronic mail, cell phone or mobile device, via text messages (SMS and/or MMS) or through any other analog and/or digital means of communication created or to be created, commercial, advertising or promotional information about the products and/or services, events and/or promotions of commercial or non-commercial nature of these, in order to promote, invite, direct, execute, inform and in general, carry out campaigns, promotions or contests of commercial or advertising nature, advanced by QUICK GO S.A.S., and/or by third parties;
7. To develop the selection, evaluation and employment process;
8. To support internal or external auditing processes; i) To register the information of employees and/or retirees (active and inactive) in QUICK GO S.A.S. databases:
9. Those indicated in the authorization granted by the data owner or described in the respective privacy notice, as the case may be;
10. Provide, share, send or deliver your personal data to QUICK GO S.A.S. subsidiaries, affiliates or subordinate companies, located in Colombia or any other country in the event that such companies require the information for the purposes indicated herein.

Regarding the data (i) collected directly at security points, (ii) taken from documents provided by individuals to security personnel and (iii) obtained from video recordings made inside or outside QUICK GO S.A.S. facilities, these will be used for security purposes of people, goods and facilities of QUICK GO S.A.S. and may be used as evidence in any type of process.

If a personal data is provided, such information will be used only for the purposes stated herein, and therefore QUICK GO S.A.S., will not proceed to sell, license, transmit, or disclose the same, unless: (i) there is express authorization to do so; (ii) it is necessary to allow contractors or agents to provide the services entrusted; (iii) it is necessary in order to provide our services and/or products; (iv) it is necessary to
disclose it to entities that provide marketing services on behalf of QUICK GO S.A.S., or to other entities with which we have joint marketing agreements; (v) the information is related to a merger, consolidation, acquisition, divestiture, or other corporate restructuring process; (vi) it is required or permitted by law.

QUICK GO S.A.S., may subcontract to third parties for the processing of certain functions or information. When effectively subcontracting with third parties for the processing of personal information or providing personal information to third party service providers, QUICK GO S.A.S., warns such third parties about the need to protect such personal information with appropriate security measures, prohibits the use of information for their own purposes and requests that personal information is not disclosed to others.

15.2 RIGHTS OF THE OWNERS OF PERSONAL DATA:

The owners of personal data by themselves or through their representative and/or proxy or their successor in title may exercise the following rights with respect to the personal data that are processed by QUICK GO S.A.S.:

1. Right of access: By virtue of which you may access the personal data under the control of QUICK GO S.A.S., for the purpose of consulting them free of charge at least once every calendar month, and each time there are substantial modifications to the Policies of Treatment of information that motivate new consultations;
2. Right to update, rectification and suppression: By virtue of which you may request the update, rectification and/or suppression of the personal data being processed, in such a way that the purposes of the processing are satisfied;
3. Right to request proof of authorization: except in the events in which, according to the legal regulations in force, authorization is not required to carry out the processing;
4. Right to be informed regarding the use of personal data;
5. Right to file complaints before the Superintendence of Industry and Commerce: for violations of the provisions of the current regulations on the treatment of personal data;
6. Right to require compliance with the orders issued by the Superintendence of Industry and Commerce.

15.3 PERSONAL DATA PROCESSING POLICY:
It may be consulted at the physical facilities of QUICK GO S.A.S. or on its website.

The ADMINISTRATIVE AREA of QUICK GO S.A.S., will be responsible for handling requests, complaints and claims made by the data owner in exercise of the rights referred to in paragraph 5 of the policy of processing of personal data, except for the one described in paragraph e). For such purposes, the holder of the personal data or whoever exercises his representation may send his request, complaint or claim through the web page.