

Privacy Policy C&S

Last Revised: June 12, 2018

This is the Privacy Policy that describes the way in which CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd manages and protects your personal information in relation to our digital channels and/or our customer relationship processes. For more information about CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd and for information of our international operations, please go to About C&S. This privacy policy applies to all the users that visit our website (whether it is visited in any electronic appliance or internet browser) and all clients that work with us in any location in the world.

CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd understands that your privacy is important. CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd is committed to respect your privacy and protect your personal information, which we consider any information that can identify you as an individual. This information can be provided by you or can be information provided when you access CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd, including information that is collected through all websites, digital channels or applications that publish a link to this Privacy Policy. The information that you have provided in the employment application process in CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd or that you have provided as a response to a request for your electronic mail (e-mail) or any type of contact by CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd. We advise any of the visitors of our website to revise this privacy policy and the privacy policies of any third party from which you have accessed this page.

Please read this policy carefully. By browsing our web site or voluntarily providing information, such as applying to a role or subscribing to publications or newsletters, you are agreeing to be bound by this Privacy Policy.

Changes to the Privacy Policy

CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd has the right to modify this policy in any given moment.

Third Party Policy

This Site can have links to other sites that are not bound by this privacy policy. CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd is not responsible for the privacy policies of any third party to whom we are linked. We encourage you to revise the privacy policies of any third-party.

How do we collect your information?

We can collect your information in the following manner:

- Personal information in certain areas of the Site, our digital channels, and/or our recruiting processes when you register for an available role

- Personal information when you register to receive newsletters, bulletins and/or alerts from CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd
- Personal information when you subscribe to participate in conferences or events managed by CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd

What type of information do we collect?

We can collect personal information from our employees, candidates, vendors, suppliers, business contacts, and other users of our web site.

We can collect the following type of information:

- Information that you provide, such as your name, mailing address, e-mail address, telephone number, fax number, country of residence, employment information, education information, social media account interactions, and any other type of information that you provide in any way in our digital channels (such as our web site) and/or other client relationship building processes.
- Personal information that we can observe or that we can infer from the way in which you interact with us or with others. For example, to improve your user experience of our web site and ensure that it is working appropriately, we or our service providers can use cookies to collect personal information. You can find information on how we can use cookies or other types of tracking technologies in our Cookie Policy.
- Automatic information about your devices used to interact with our digital channels (such as our web site) which may include: IP address, device identifier, web explorer and the information that the web explorer gathers using cookies, the type of browser used, languages, times of access, complaints details, web beacons, pixels, transparent gifs and other similar technologies.
- Information automatically collected about the way in which you use our digital channels (such as our web site) such as what you have searched for and what you have seen in our digital channels (such as our web site). The information that is automatically collected will be associated to any personal information that you have provided.
- Personal information that can include information referred to as “confidential” or of “special categories” such as details of diets (ex what we can provide in a work lunch or at a meeting). In a strange occasion, we can collect this confidential information when you provide this information in a voluntary manner or we may request this information as a legal requirement imposed on us.
- The types of personal information that we collect can differ with how much you interact with our page.
- User browsers can conduct surveys or use technologies to provide CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd information such as user identity, user visualization habits, and other behavioral information.

We understand the importance of protecting the privacy of minors. Our digital channels (such as our web page) and our services are not designed for, or intentionally directed to minors. It is not in our policy to collect or save information from minors.

How we use your information

The personal information that we collect can be used when we have specific consent to do so or when CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd has a legitimate interest or legal basis for the processing of said information.

We are required by law to define in this privacy policy the legal motives that we are based in order to process your information.

In summary, we use your personal information for:

- Our legitimate interest of the effective delivery of our digital channels (such as our web site)
- Our legitimate interest in the legal and effective operation of our digital channels (such as our web site)
- The legal and regulatory obligations that we are subject to, such as keeping records for tax purposes or providing information to a law enforcement entity

To the extent that we process any type of personal confidential information for any of the purposes outlined above, we will do so because you have given explicit consent to process your information or when the processing is necessary for the establishment or defense of legal claims, or you have made the data manifestly public.

Use of personal information that we collect through our digital channels (web site):

Purpose	Legal Basis
Operating and managing our business operation	Justifiable in the basis of our interest to ensure the appropriate functioning of our business operations
Monitoring the use of our systems and of our digital channels (such as our web site)	Justifiable in the basis of our interest to evade noncompliance and protect our reputation
Recruiting	Justifiable in our legitimate interest that we are recruiting adequate candidates and employees
Facilitating our communication with you	Justifiable in the basis of our interest to evade noncompliance and protect our reputation
Manage our contractual or employment relationships with you	Necessary for the operation of the contract to which you are part of
Manage and improve our digital channels (such as our web site) and the respective security	Justifiable in the basis of our interest that you can have an excellent user experience and that our digital channels and information are secure
Adapt the content of our digital channels (such as our web site) to provide a personalized user experience	Justifiable in the basis of our interest to ensure the appropriate functioning of our business operations
Manage and respond to any request that you have made through our digital channels (such as our web site)	Justifiable in the bases of our interest in ensuring appropriate communication with you

Use of personal information for other types of information that are part of the operation of our systems:

Purpose	Base legal
Comply with legal or regulatory requirements	Necessary to comply with legal obligations that we are subject to
Comply with requests and communications from competent authorities	Justifiable with our interest to comply with obligations from legal authorities
Send you details of our products and services provided by us that might interest you or contact you to receive feedback of our service or contact you for marketing or research purposes	Justifiable with our interest to ensure that we can manage and grow our business
Protect our rights	Protect our rights

CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd does not sell or share your personal information with third parties for direct marketing purposes from these third parties. We are legally required to obtain your explicit consent to provide you with certain marketing materials. We will only provide these marketing materials when we have received your consent. If you don't want to continue receiving any type of marketing material from us, you can cancel your subscription from the communication or email.

Who we can share your information with

Third parties to whom we can share information with are:

- Our professional advisors
- Our service providers that process information in our behalf to help us manage some of our internal business operations such as email distribution, IT services, marketing, events, etc.
- Third parties connected to a corporate or commercial transaction (potential)
- Public or government authorities
- Legal Agencies
- Our subsidiaries or affiliates

Some of these third parties may be located in different countries. Before we share with or transfer information to them, we will take the necessary steps to ensure that your personal information has adequate protection as it is required by privacy laws or our internal policies.

Unless you are otherwise notified, any transfer of your personal information must be managed under specific standards from the region or country to which the information belongs to. If this transfer is a transfer of personal information within the EEA (European Economic Area) to third parties outside the EEA, this transfer will be based on an adequacy decision or are governed by the standard contractual clauses from the EEA. Any other non-EEA related transfer of your personal information will take place in accordance with the appropriate international data transfer mechanisms and standards. By using our

digital channels (such as our web site) or voluntary sending information to CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd, you are granting voluntary consent of said international information transfers and hosting of this information to these countries or third parties.

Confidential Information

As previously mentioned, we generally do not try to collect confidential information, also referred to as sensitive data, in our digital channels (as in this web site). In the instances in which we do collect the information, we will do so under the data privacy law requirements and/or asking for your consent

The term sensitive data refers to various categories of personal information identified by data privacy laws as information that requires special treatment. These categories include: racial or ethnic origin, political opinions, philosophic or similar beliefs, union memberships, physical or mental health, biometric or genetic information, sexual orientation, or criminal offenses or convictions (including information about suspect criminal activities).

Our Security

CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd considers security as a very important topic. We understand that the cyber risk and cyber security programs are key to the responsible management of your information. We maintain organizational, physical and technical security controls for all the personal information that we store. We have protocols, politics, and procedures to maintain our controls, taking into account the associated risks with the categories of personal information and the processing that we undergo of this information.

User forums

You have to take into account that when you share information publicly online, this information can be collected and used by other people. CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd is not responsible for any action or third-party policies that collects information from users that publicly divulge information in any forum of our digital channels (such as our web site). Our security norms have been designed to protect personal information against loss, improper use, alterations and destructions.

Only authorized personnel from CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd and its external service providers will have access to the personal information and these personnel and these service providers shall treat this information as confidential. Even though we take precautions to protect personal information that are generally accepted as security standards, CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd cannot guarantee that people without authorization obtain access to your personal information. CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd cannot be made responsible for any action resulting from a security violation when the information is provided through the Internet or in any public network devices. You shall understand that the open-ended nature of the Internet is such that the personal information that flows through networks that can connect you to our systems without security measures and can be accessed and used by different people than those to whom the information was initially destined for.

Time duration that we will keep your personal information

We will keep your personal only for the duration of time that is necessary. We maintain specific policies and procedures of record management and retention so that the personal information is eliminated after a period of time according to our criteria of retention:

- We keep information as long as we maintain a relationship with you or we are providing you with services
- We retain information as long as it is required to comply with legal or contract global obligations

Social Networks

Some social networks can permit you to start a session and associate CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd with your social network accounts, which can include, in a non-comprehensive manner, Twitter, LinkedIn, Facebook and YouTube. The Sites that may allow you to start a session with an CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd account using certain credentials used in your social network accounts.

When you link your social network account with CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd or start a new session in a CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd account using your credentials from a social network account, you are authorizing us to access information that you have already made available in your public profile in said social media account. The information includes information available in your public profile according to the social network and the account settings, but it may include also your email address, real name, profile picture, gender and location. We use the information that we receive from your social network accounts with accordance to the terms of use from the particular social network and this Privacy Policy. You can consult the privacy configurations from your social network accounts to obtain information about the data that is shared with CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd and other related applications and you can also manage what information is shared through your account, such as information about your activity in our digital channels (such as our web site).

If you wish to unlink a social media account with us, you can consult the settings from said account and your provider.

Your rights

You have the right (in the circumstances and under the conditions, subject to exceptions, established in the applicable law) to:

- Request for access to your personal information that we process: this grants you the right to know if we store your information, and if we do, you have the right to obtain information from or receive a copy of your personal information that we may have
- Request a correction to your personal information: this grants you the right to correct your personal data when it is wrong or incomplete

- Right to oppose to the processing of your personal information: this grants you the right to request CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd to stop processing your information
- Request that your personal information is eliminated or erased: when this personal information is no longer necessary for work purposes
- Request for restriction of processing of your personal information: you can request CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd to solely process your information in limited circumstances
- Request for the right of portability of your personal data: you can request a copy of your information
- Right to complain: If you are not satisfied by the way in which we handle your personal information or with any question or request you have made us, you have the right to complain with any authority (in EEA you have a right to complain with U Data Protection Authority (“DPA”) in your jurisdiction).

Who is responsible for the treatment of your personal information and how can you contact us?

If you have any question regarding our privacy policy, you can contact us in the following:

CyS Clientes y Estrategia SAS / C&S Customers and Strategy Ltd

Address: Carrera 43 A # 1 Sur 31 Oficina 501 Medellín, Colombia

Phone Number: +574 2665410

Contact email for the protection of your information: dataprivacyoffice@customersandstrategy.com