

DATA PROCESSING POLICY

FERIA HOME, HOGAR, MUEBLES Y ESPACIOS S.A.S. - Nit: 900.669.656-8 In compliance with the provisions of Articles 15 and 20 of the Political Constitution of Colombia, Law 1266 of 2008, Law 1581 of 2012 and the Regulatory Decree 1377 of 2013, by which provisions are issued for the protection of personal data, FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS, in its capacity as responsible for the processing of personal data, informs the general guidelines in this matter:

Identification of the data controller

FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS, identified with Nit: 900.669.656-8, located at Carrera 41 #14-27 Apt 1004, Website www.laferiadediseno.com, mail contabilidad@laferiadediseno.com is responsible for the processing of your personal data.

Glossary

- **Authorisation:** Prior, express and informed consent of the Data Subject to carry out the Processing of personal data;
- **Database:** Organised set of personal data that is the object of Processing;
- **Personal data:** Any information linked or capable of being linked to one or more specific or identifiable natural person(s);
- **Processor:** A natural or legal person, public or private, who by himself or in association with others, carries out the Processing of personal data on behalf of the Controller;
- **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;
- **Data subject:** Natural person whose personal data is the object of processing;
- **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- **Principle of legality:** The processing of personal data is a regulated activity that must be subject to the provisions of the law and other provisions that develop it;
- **Principle of purpose:** The processing must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Data Subject;



- **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 authorisation, or in the absence of a legal or judicial mandate that relieves consent;
- **Principle of truthfulness or quality:** The information subject to processing must be truthful, complete, accurate, up-to-date, verifiable and comprehensible. The processing of partial, incomplete, fragmented or misleading data is prohibited;
- **Principle of transparency:** The right of the Data Subject to obtain from the Controller or the Processor, at any time and without restriction, information about the existence of data concerning him/her, must be guaranteed in the Processing;
- **Principle of restricted access and circulation:** Processing is subject to the limits resulting from the nature of the personal data, the provisions of the law and the Constitution. In this sense, the Processing may only be carried out by persons authorised by the Data Controller and/or by the persons provided for by law. Personal data, except for public information, may not be made available on the Internet or other forms of mass dissemination or communication, unless access is technically controllable in order to provide restricted knowledge only to Data Controllers or authorised third parties in accordance with the law;
- **Principle of security:** The information subject to Processing by the Data Controller or Data Processor shall be handled with the technical, human and administrative procedures necessary to provide security to the records, avoiding their adulteration, loss, consultation, unauthorised or fraudulent use or access;
- **Principle of confidentiality:** All persons involved in the Processing of personal data that are not of a public nature 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, and may only supply or communicate personal data when this corresponds to the development of the activities authorised by law and in accordance with the terms of the same.

Content of databases

The FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS databases store general information such as full name, identification number and type, gender and contact details (email, physical address, landline and mobile phone). In addition to these, and depending on the nature of the database, FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS may have specific data required for the treatment to which the data will be subjected.



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The databases of employees and contractors include, in addition to information on employment and academic history, sensitive data required by the nature of the employment relationship (photograph, composition of the family group).

Sensitive information may be stored in the databases with the prior authorisation of the owner, in compliance with the provisions of articles 5 and 7 of law 1581 of 2012.

Treatment

With this policy, FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS, in compliance with its legal and regulatory obligations, is committed to making effective the constitutional guarantee of protection of the personal and family privacy of all collaborators, suppliers, employees, clients and other parties holding personal data, establishing instruments and controls to give appropriate treatment to the information it administers.

This policy establishes the terms, conditions and purposes under which FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS, as the party responsible for the personal data obtained, treats the information of all persons who at any time, due to the activity carried out by the company, have provided personal data (hereinafter 'Data Subject').

These terms and conditions apply to any registration of personal data made in person and/or virtually for the purchase, sale or request for information on any product or service offered by FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS. FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS is directly responsible for the processing of Personal Data; however, it reserves the right to delegate this processing to a third party. FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS requires the person in charge to pay attention to and implement suitable guidelines and procedures for the protection of personal data and the strict confidentiality of the same.

Respect to the processing of sensitive data or data whose owner is a under age person, FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS adapts all the necessary measures for their protection and points out the following:



- Sensitive data: FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS informs the holder of sensitive data that he/she has the right to choose not to provide any sensitive information requested, related, among others, to data on his/her racial or ethnic origin, membership of trade unions, social or human rights organisations, political or religious convictions, sexual life, biometric or health data.
- Data of under age minors: The provision of personal data whose owner is a under age minor is optional, and must be carried out with the authorisation of the parents or legal representatives of the minor. FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS will only use, store and process personal data of minors who are children, descendants or who depend on or are in the care of employees or contractors of FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS or hold rights derived from affiliation with any of them, provided that they are of a public nature. The purpose of such processing shall be exclusively to plan and carry out activities related to the personal and family wellbeing of partners, employees and minors, affiliations as a dependent to the social security system and the issuing of summons to shareholders' meetings. For these purposes, FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS shall take into account the respect and prevalence of the rights of minors, their best interests and their fundamental rights.

Purpose

The information collected by FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS is intended to allow the proper development of its corporate purpose. In addition, FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS keeps the information necessary to comply with legal obligations, mainly in accounting, corporate and labour matters.

Information about current or former customers, suppliers, partners and employees is stored for the purpose of facilitating, promoting, enabling or maintaining employment, civil and commercial relationships.

Specific purposes

With clients and/or potential clients:

1. Implement the existing contractual relationship.
2. To provide information about products and/or services, or about changes to products and/or services.



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3. Provide required products and/or services.
4. To control the products delivered.
5. Evaluate the quality of the service.
6. The performance of statistical, commercial, strategic, financial and other analyses relating to the corporate purpose of FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS.
7. Send to the physical or electronic mail, mobile phone or mobile device, via text messages (SMS and/or MMS) or through any other analogue and/or digital way of communication, commercial, advertising or promotional information about the machinery, equipment, services, events and/or promotions of a commercial nature, in order to promote, invite, direct, implement, inform and generally perform campaigns, promotions or competitions of a commercial or advertising nature, developed by FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS and/or by third parties.
8. Consult credit/financial information and make reports to the risk centres that FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS considers relevant, for the purposes of client association, granting of credits, referrals and/or reporting of behaviour and/or non-compliance with payments.
9. Transmission and/or transfer of databases to third parties and/or subsidiaries for statistical, commercial, strategic and financial purposes.
10. To do the commercial referrals that FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS considered pertinent for the support, expansion and/or growth.

With employees, service providers and candidates:

1. To perform the processes of recruitment, execution and termination of the employment relationship and/or the provision of services.
2. To develop the process of selection, evaluation, employment and/or service provision.
3. To carry out the processes of affiliation to social security.
4. Attend internal or external audit processes.
5. Application of occupational medical examinations.
6. The performance of statistical, commercial, strategic, financial and other analyses relating to the corporate purpose of FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS.



7. Send to the physical or electronic mail, mobile phone or mobile device, via text messages (SMS and/or MMS) or through any other analogue and/or digital way of communication, commercial, advertising or promotional information about the machinery, equipment, services, events and/or promotions of a commercial nature, in order to promote, invite, direct, execute, inform and generally run campaigns, promotions or competitions of a commercial or advertising nature, carried out by FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS and/or by third parties.
8. Consult credit/financial information and make reports to the risk centres that FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS considers relevant, for the purposes of client association, granting of credits, referrals and/or reporting of behaviour and/or non-compliance with payments.
9. Transmission and/or transfer of databases to third parties and/or subsidiaries for statistical, commercial, strategic and financial purposes.
10. To make the commercial references that FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS considered pertinent for the support, expansion and/or growth.

With suppliers

1. Implement the existing contractual relationship.
2. Contact and contract new machinery, equipment and/or services that FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS requires for the normal functioning of its operation.
3. To supply, share, send, transfer and deliver your personal data to subsidiary, related or subordinate companies of FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS, and/or third party collaborators, in the event that said companies require the information for their purposes.
4. Send to the physical or electronic mail, mobile phone or mobile device, via text messages (SMS and/or MMS) or through any other analogue and/or digital media, commercial, advertising or promotional information about the machinery, equipment, services, events and/or commercial promotions, in order to promote, invite, direct, execute, inform and generally implement campaigns, promotions or competitions of a commercial or advertising nature, developed by FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS and/or by third parties.
5. To make the commercial references that FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS considers relevant for the support, expansion and/or growth of the company.



Rights of the holders

In accordance with the stipulations of article 8 of law 1581 of 2012, the holders may:

- To know, update and rectify their personal data against the COMPANY or those in charge. This right may be executed, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or data whose processing is expressly prohibited or has not been authorised.
- Request proof of the authorisation granted to the COMPANY, except when expressly exempted as a requirement for the Processing, in accordance with the provisions of Article 10 of this law.
- Be informed by the COMPANY or the Processor, upon request, about the use it has made of your personal data
- File complaints to the Superintendence of Industry and Commerce for infringements of the provisions of this law and other regulations that modify, add to or complement it.
- To revoke the authorisation and/or request the deletion of the data when the Processing does not respect the constitutional and legal principles, rights and guarantees. The revocation and/or deletion will proceed when the Superintendence of Industry and Commerce has determined that the COMPANY or the Processor has incurred in conduct contrary to this law and the Constitution.
- Access free of charge to their personal data that has been the subject of Processing.

Obligations of the company

FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS should be:

1. Guarantee the Data Subject, at all times, the full and effective exercise of the right to habeas data.
2. Request and keep, under the conditions provided for in this law, a copy of the respective authorisation granted by the Data Controller.
3. Properly inform the Data Subject about the purpose of the collection and the rights he/she is entitled to by virtue of the authorisation granted.
4. Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, unauthorised or fraudulent use or access.



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5. Ensure that the information provided to the Data Controller is true, complete, accurate, up to date, verifiable and comprehensible.
6. Update the information, communicating in a proper and timely manner to the Data Processor, all new developments with respect to the data previously provided and take other necessary measures to ensure that the information provided to the Data Processor is kept up to date.
7. Rectify information when it is incorrect and communicate the relevant information to the person in charge.
8. Provide the Processor, as the case may be, only with data whose Processing has been previously authorised in accordance with the provisions of this law.
9. Demand to the Data Controller at all times respect the conditions of security and privacy of the Data Subject's information.
10. Process queries and claims formulated under the terms set out in this law.
11. Adopt an internal manual of policies and procedures to ensure adequate compliance with this law and, in particular, to deal with queries and complaints.
12. Inform the Data Controller when specific information is under discussion by the Data Subject, once the complaint has been filed and the respective process has not been completed.
13. Inform upon request of the Data Subject about the use given to his or her data;
14. Inform the data protection authority when there are violations of the security codes and there are risks in the administration of data subjects' information.
15. Carry out the instructions and requirements issued by the Superintendency of Industry and Commerce.

Person or area responsible

Any request, complaint or claim related to the treatment of personal data, in application of the provisions of Law 1581 of 2012 and Decree 1377 of 2013, should be sent to:

Company:	FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS
Address:	Carrera 41 #14-27 Apto 1004
Email:	contabilidad@laferiadediseno.com
Phone:	(+57) 313 637 3318



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Procedures for submitting and responding to queries, complaints and reclamations

In order to ensure that your request is dealt with promptly and correctly, please note that in all cases you must provide the following information:

- Identification of the Holder
- Description of the facts giving rise to the claim
- Address of the holder
- Documentation to be submitted as evidence

Consultations: They will be resolved within a maximum period of ten (10) working days from the day following the date of receipt. When it is not possible to answer the query within this period, the interested party will be informed two (2) working days prior to the deadline, stating the reasons for the delay and indicating the date on which the request will be dealt with, which in no case may exceed five (5) working days following the expiry of the first deadline.

Claims: the maximum term to address the claim will be fifteen (15) working days from the day following the date of receipt. When it is not possible to deal with the claim within this period, the interested party will be informed of the reasons for the delay and the date on which the claim will be dealt with, which in no case may exceed eight (8) working days following the expiry of the first period.

If the claim is incomplete, the interested party will be required within five (5) days of receipt of the claim to rectify the faults. After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

Once the completed complaint has been received, a legend will be included in the database stating 'complaint in process' and the reason for the complaint, within a period of no more than two (2) working days. This legend must be maintained until the complaint is decided.

Validity of the database

The Personal Information Processing Policies of FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS are effective as of 15 October 2016.



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FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS reserves the right to modify them, under the terms and with the limitations provided for by law, informing the owners in advance or at the latest before the modification.

The databases administered by FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS will be kept for as long as it carries out its purpose, and as long as it is necessary to ensure compliance with legal obligations, particularly labour and accounting obligations, but the data may be deleted at any time at the request of the holder, as long as this request does not contravene a legal obligation of FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS or an obligation contained in a contract between FERIA HOME, HOGAR, MUEBLES Y ESPACIOS SAS and the holder.

