

	<b>PERSONAL DATA PROTECTION AND PROCESSING POLICY</b>	CÓDE	GG-POL-08
		VERSIÓN:	02
		DATE	30/12/2025
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## 1. GENERAL PROVISIONS

This document establishes the Personal Data Processing Policy of COLREMAQ SUGAR CANE S.A.S. (hereinafter “COLSUGAR”), a company legally constituted under applicable regulations and dedicated to the supply of machinery, spare parts, services, and maintenance for the agricultural, transportation, and construction sectors.

This Policy is adopted in strict compliance with Law 1581 of 2012, Decree 1377 of 2013 (compiled in Single Decree 1074 of 2015), and other regulations that modify or supplement them. Its main purpose is to define the institutional guidelines, procedures, and mechanisms to guarantee the protection of the constitutional right to Habeas Data for all data subjects.

Through this instrument, COLSUGAR ensures that the processing of personal data is governed by the principles of legality, purpose, freedom, accuracy, transparency, security, and confidentiality, applicable to the collection, storage, use, circulation, and deletion of data within its databases.

## 2. DEFINITIONS

**AUTHORIZATION:** Prior, express, and informed consent of the data subject to carry out the processing of personal data.

**DATABASE:** An organized set of personal data subject to processing.

**PERSONAL DATA:** Any information linked to or that can be associated with one or more identified or identifiable natural persons.

**PROCESSOR:** A natural or legal person, public or private, who processes personal data on behalf of the Data Controller.

**CONTROLLER:** A natural or legal person, public or private, who decides on the database and/or the processing of personal data.

**DATA SUBJECT:** A natural person whose personal data is subject to processing.

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

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### 3. SCOPE OF APPLICATION

This Policy applies to all personal data processing carried out within the territory of the Republic of Colombia by COLSUGAR, including employees, suppliers, contractors, and any natural persons with whom the company interacts.

### 4. DATA CONTROLLER

COLSUGAR is a legally established commercial company headquartered in Palmira, Valle del Cauca, Colombia.

**CONTACT:**

**ADDRESS:** Km 6 Cencar – Airport Road

**PHONE:** +57 602 669 4689

**EMAIL:** direccion.juridica@synermin.com

### 5. DATABASE CONTENT

COLSUGAR databases store general information such as full name, identification number and type, gender, and contact information (email, address, phone numbers).

### 6. DATA PROCESSING

Information contained in COLSUGAR databases may be subject to various forms of processing, including collection, exchange, updating, processing, reproduction, compilation, storage, use, systematization, and organization.

### 7. PURPOSE

The information collected by COLSUGAR supports the proper development of its corporate purpose related to the supply of machinery, spare parts, services, and maintenance for the agricultural, transportation, and construction sectors.

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## 8. DATA SUBJECT RIGHTS

Data subjects have the right to know, update, and rectify their personal data, request proof of authorization, be informed about the use of their data, file complaints with the Superintendence of Industry and Commerce, revoke authorization, and access their data free of charge.

## 9. COLSUGAR OBLIGATIONS

COLSUGAR guarantees the protection of personal data and the proper implementation of security, confidentiality, and transparency measures in accordance with Colombian data protection laws.

## 10. REQUEST AND COMPLAINT PROCEDURES

Requests, complaints, or claims regarding personal data processing may be submitted to the Legal Department of COLSUGAR via email or written communication.

## 11. DATABASE VALIDITY

This policy is effective as of December 30, 2025. Personal data will be retained only for the period necessary to fulfill the purposes for which they were collected and in compliance with legal obligations.

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**JOSE ANGEL MARIN HERNANDEZ  
(ALTERNATE LEGAL REPRESENTATIVE)**