



PERSONAL DATA PROCESSING POLICY OF IMAGINE COLOMBIA DMC SAS

Imagine Colombia DMC SAS, in compliance with Statutory Law 1581 of 2012, which establishes the General Data Protection Regime in Colombia, and Regulatory Decree No. 1377 of 2013, as well as the best international practices in this field, is responsible for processing your personal data. This policy establishes the general guidelines and procedures followed for the proper handling of personal data provided in accordance with applicable legal provisions.

1. DATA CONTROLLER

As the data controller, **Imagine Colombia DMC SAS** makes the following information available to data subjects:

- Address: Carrera 59 # 1 – 44 Ed. Guadalupe 1 - 401, Cali – Colombia
- Phone: +57 3104377618
- Email: imagina@imaginecolombia.com
- Website: www.imaginecolombia.com

2. SCOPE

This policy applies to all personal data stored or registered in the databases of **Imagine Colombia DMC SAS**.

3. PROCESSING AND PURPOSE

Personal data will be used by **Imagine Colombia DMC SAS** to carry out the objectives of its incorporation, such as organizing tourism-related commercial activities for both foreign and Colombian travelers, including but not limited to:

- Designing travel itineraries in Colombia and abroad.
- Organizing the logistics of each travel itinerary, including hotel bookings, private transportation coordination, activity planning, and restaurant reservations.
- Providing assistance to tourists during their stay in Colombia and abroad.

4. PROCESSING OF SENSITIVE DATA

Sensitive personal data is NOT collected, such as religious or philosophical beliefs, sexual life, sexual orientation, political opinions, union membership, health information, genetic and



biometric data, or information about criminal records. When required by law to collect any type of sensitive data, the data subject will be informed in advance, and the guidelines in the regulations regarding such data will be followed.

5. RIGHTS OF DATA SUBJECTS

According to data protection laws, the following are your rights as a data subject:

- To know, update, rectify, delete, and revoke personal data. This right may be exercised, among others, with respect to partial, inaccurate, incomplete, misleading data, or data whose processing is expressly prohibited or unauthorized.
- To request proof of the consent or authorization granted for processing.
- To be informed about how Imagine Colombia DMC SAS has used your personal data.
- To file complaints with oversight authorities for breaches of current legislation and any amendments or supplements.
- To access your personal data free of charge.
- To refrain from answering questions about sensitive data.

6. PROCEDURES FOR ACCESS, UPDATE, DELETION, REVOCATION, AND RECTIFICATION

The data subject may request the update, deletion, revocation, or rectification of their information, or make inquiries or complaints, through the contact channels listed in section.

Imagine Colombia DMC SAS will verify the identity, analyze, classify, and respond to the request within the legally established timeframes, using the same channel through which the request was received or as specified by the data subject. Data deletion and/or revocation will not proceed if the data subject has a legal or contractual obligation to remain in **Imagine Colombia DMC SAS**'s databases.

Requests must meet the following requirements:

- Addressed to **Imagine Colombia DMC SAS**.
- Include identification of the data subject, their heir, representative, or legal proxy.
- Contain a description of the facts giving rise to the request.
- Provide contact information for the response.
- Include supporting documents and evidence.



If the request is incomplete, the applicant will be asked to correct the deficiencies within five (5) days. If two (2) months pass without receiving the required information, the request will be considered withdrawn.

The maximum period to respond is fifteen (15) business days from the day following receipt. If it is not possible to respond within this period due to complexity, the applicant will be notified of the reason and the new response date, which may not exceed eight (8) additional business days.

7. INQUIRY, COMPLAINT, AND PETITION CHANNELS

Imagine Colombia DMC SAS has the following channels to receive and address requests, inquiries, and complaints related to personal data: by post to Carrera 59 # 1 – 44 Ed. Guadalupe 1 - 401, Postal Code 760001, Cali – Colombia; or by email to imagina@imaginecolombia.com.

8. IMAGINE COLOMBIA DMC SAS POLICIES ON PERSONAL DATA PROCESSING

- Comply with the Constitution and current regulations in the processing of personal data.
- Obtain the data subject's express authorization in physical, electronic, and/or telephone form, allowing later verification of their consent. Consent may also be inferred from clear and unambiguous actions by the data subject.
- Ensure confidentiality, integrity, and availability of personal data.
- Personal data will only be processed by employees or parties responsible for data management as needed for their job functions or contractual obligations.
- Employees must maintain confidentiality during and after their relationship with the company.
- Data will only be processed for the purposes authorized by the data subject.
- Personal data will not be published online or in mass media unless required by law or if the information is public.
- Data will be safeguarded according to the organization's security and retention policies.
- Take necessary steps to keep the data up to date.
- Correct inaccurate data and inform third parties when necessary.
- Respond to requests and complaints in accordance with current law.



- Delete data when requested by the subject and there is no legal or contractual obligation to retain it.
- Protect data against unauthorized or fraudulent access, use, or alteration.
- Implement appropriate security measures for sensitive data, including personal information about employees' children.
- Promote a corporate culture that respects and protects data subjects' rights through training.
- Guarantee the full and effective exercise of the right to habeas data.
- Clearly inform data subjects of the purpose of data collection and their associated rights.
- Ensure that any data shared with authorized third parties is accurate, complete, updated, verifiable, and understandable.
- Share data with public entities only when required in the exercise of their duties.
- This policy may be amended at any time to comply with legal standards and best international practices. Any updates will be published through appropriate channels for the data subjects to be informed.
- Comply with obligations related to the Database Registration when applicable.

9. VALIDITY

The databases storing personal data will remain active as long as the information is used for the purposes described in this policy.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed of any changes during your relationship with us.