

DATA PROTECTION POLICY

WENDELL S.A.S.



I. ABOUT US

WENDELL S.A.S. is a company dedicated to the fabrication, import and distribution of fusible interlining woven and non-woven for the manufacturing industry

ID INFO- **WENDELL S.A.S.**, NIT 900.796.244-0

CONTACT INFO: Address: Carrera 74 N° 30B – 34 Medellín

Tel: 581 73 17

Website www.wendellservices.com.co

E-mail: diana@wendellservices.com

DEFINITIONS

- **Authorization:** It refers to the previous consent, expressed and informed by the owner of the information so Wendell SAS or the personnel designated by it carry the treatment of the personal data provided by the owner of such information.
- **Privacy notice:** It refers to the document in physical, electronic or any other format generated by Wendell SAS that has been placed at the disposal of the data owner for the treatment of the personal information. Said document explains all the information related to the existence of the policies for data protection that will be applicable, the ways to access said policies and the characteristics of the treatment intended to be given to the information provided.
- **Data Base:** It's the organized set of personal data, object of the treatment. This includes physical and electronic files. The databases property of Wendell SAS are detailed in the section VI of this policies.
- **Personal data:** According to the law 1581 of 2012, it is any information binded or subject of association to one or various people subject of determination.
- **Public data:** Personal data qualified as public by the law or the constitution. Are considered public among others the data related to the civil status of the people or those related to the profession or occupation as merchant or public servant
- **Sensitive data:** Personal data that if affected in its use will directly affect the intimacy of the owner of the information or in which case if given a wrongful use may cause discrimination such as those related to the racial, ethnic origin, politic orientation, religious and or philosophical convictions, association to unions, social organizations, human rights organizations o any that promotes

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interests of any political party and any other data related to the health, sex life and biometrical data.

- **Owner:** Natural person whose personal information is object of treatment.
- **Treatment:** Any operation or set of operations given to the personal data performed by Wendell SAS or the person in charge of the processing in the name of Wendell SAS such as recollection, storage, use, circulation or suppression of said information.
- **Transfer:** Shipping of personal data to a recipient which in its turn is responsible for the treatment in the same terms established in the law 1581 of 2012.
- **Transmission:** Communication of the personal data to the person in charge of the treatment, inside or outside the Colombian territory with the sole purpose of being treated by the person established as responsible in the Company Wendell SAS

II. TREATMENT TO WHICH THE PERSONAL INFORMATION WILL BE SUBMITTED

The personal data of final clients, suppliers, active and former employees that henceforth will be recollected or found on our databases will be treated with the following purposes.

DEFINITIONS

Final clients: WENDELL S.A.S., Will use the provided information to:

1. To carry out the pertinent negotiations for the development of the stage precontractual, contractual and post contractual with WENDELL S.A.S., regarding any of the products or services offered by it that exists or not acquired or, concerning any underlying business relation that has with it, as well as to give fulfillment to the Colombian or foreign law and the orders of judicial or administrative authorities.
2. To manage steps (requests, complaints, claims), to perform analysis of risk, surveys of satisfaction regarding the goods and services of the company, as well as its commercial allies.
3. To supply information of contact and pertinent documents to the sales force, network of distribution, TV marketing, market research and any third party with whom the company possesses a contractual link of any nature.
4. To announce, to transfer and / or transfer my personal information inside and out of the country, to third parties as a result of a contract, law or any lawful link that like that needs it, or to implement services electronic storage in the cloud

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5. To perform by any mean in direct form or through third parties the programming and provision of technical service, sale, purchase, invoicing, management of portfolio, follow-up to the performance of the product, collection, business intelligence, activities of marketing, promotion or advertising, improvement of the service, as well as any another related one to our products and current and future services, for the fulfillment of the commitments and of the corporate purpose of the company.

6. for the shipment and receipt of goods or advertising material in agreement to the requirements of the demanded functions and sustainability of the business of the company.

7. to control and to anticipate fraud in any of its forms

Suppliers, contractors and / or employees and former employees: To make analysis, evaluations and selection of suppliers and / or potential contractors. Communication of our policies and procedures for the binding of suppliers. Analysis of information about quality and levels of service received of the suppliers. Legal fulfillment in fiscal, customs and commercial matters with administrative and judicial entities. To initiate agreements of business to acquire goods or services Control and payments for the goods and services received. Labors of monitoring, control and accounting records of the obligations contracted with the suppliers. Consultations, audits and reviews derived from the agreements with the suppliers and / or contractors. To control and to anticipate the fraud in any of its modalities

Some of these labors are made in fulfillment of a legal and contractual duty and therefore the processing of personal information is understood included in the same ones.

III. THE RIGHT OF THE OWNERS

The owners of the Personal Information registered in WENDELL's Databases S.A.S., have the following rights:

a. To know, to update and to rectify their personal information. These rights will be able to be exercised , among others, opposite to Personal partial, inaccurate, incomplete, Information, which can induce to error, or those which treatment is expressly prohibited or unauthorized;

b. To request proof of the Authorization granted to WENDELL S.A.S., except when it is exempted expressly as requirement for the Treatment, in conformity with the foreseen in the article 10 of the Law 1581 of 2012.

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c. To be informed regarding the use that has been given to their Personal Information by WENDELL S.A.S., or the manager of the treatment, previous request;

d. By means of claim presented in conformity with the Art. 15 of the Law 1581 of 2012, they can request the cancellation of the authorization and / or request the suppression of the Personal Information when the treatment doesn't respect the principles and constitutional and legal rights or at any time providing that the holder does not have the legal or contractual duty to remain in WENDELL's databases S.A.S., and in agreement with the procedure appointed in the numeral 4 of this policy

e. To accede in free form once a month to the Personal Information that have been an object of Treatment.

IV. PROCEDURE OF CONSULTATIONS AND CLAIMS.

WENDELL S.A.S., guarantees the right to consultation, supplying the people who act in exercise of this right, all the information contained in their individual record or that is linked by the identification of the owner.

The person in charge of attending to the requests in exercise) of the rights on the part of the holders will be the Juridical Direction and of Systems or the dependence equivalent, as the person who will receive, process and canalize different request that are received, and he/she will deliver them to the respective dependence already mentioned in charge of the management of the treatment, dependences who once receive these communications, will begin to fulfill the function of protection of the personal information, and will have to execute the requests of the holders, in the terms, period and conditions established by the legal force , for the exercise of the rights of access, consultation, rectification, update, suppression and recall to which the law refers on protection of personal information

For the attention of requests of consultation of personal information WENDELL S.A.S., guarantees, that exist media of electronic and telephonic communication.

Information of contact: Address: Carrera 74 N ° 30B - 34 Medellin Tel: 581 73 17 website www.wendellservices.com.co, e-mail: diana@wendellservices.com

In any case, independently of the mechanism implemented for the attention of requests of consultation, these will be attended in a maximum term of ten (10) working days counted from the date of its receipt. In case of inability to attend to the consultation inside the above mentioned term, they will inform the

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interested party before the end of the term of 10 days, expressing the motives of the delay and indicating the date in which they will be attending the consultation, which in no case will be able to be longer than five (5) working days following the end of the first term.



In this same way we guarantee the right of claim, to the databases for the correction, update or suppression, or when they warn the alleged breach of the duties in any of the duties contained in the Law 1581 of 2012 and other procedures applicable. The claim will be performed under the following rules:

1. If the received claim does not rely on complete information that allows to start the consultation such as, the identification of the owner, the description of the facts that give place to the claim, the address, and accompanying the documents required, the claimant will be solicited in the following five (5) days the reception of the claim so they correct the flaws. Once two months pass from the date of the requirement without the solicitor presents the needed information, there will be understood that the claim has been desisted
2. If for some circumstance WENDELL S.A.S., receives a claim directed to another organization, it will give movement to whom corresponds in a maximum term of two (2) working days and it will inform the claimant about the situation.
3. Once the claim is received in its complete form, a mention that says "claim in process" and the motive of the same will be include in the database managed by WENDELL S.A.S. in a term not longer than two (2) working days. The above mentioned note will have to be kept until the claim is determined.
4. The maximum term to access to the claim will be fifteen (15) working days counted from the day following to the date of the reception. When it's not possible to attend to it inside the above mentioned term, the interested party will be informed before the end of the above-mentioned term the motives of the delay and the date in which its claim will be attended, which in no case will be able to overcome eight (8) working days following the end of the first term

Special rules for the exercise of the rights of the owners: The request of rectification, update or suppression must be presented across the means enabled by WENDELL S.A.S., indicated in the notice of privacy and in this document, and they will have to contain, as minimum, the following information:

1. The name, address of the owner and way of contact to receive the response as telephone, e-mail, address of residence.

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2. The documents that accredit the identity or the representation of his/her proxy.
3. The clear and precise description of the personal information regarding which the owner seeks to exercise some of the rights.
4. In any given case other elements or documents that facilitate the location of the personal information.
5. WENDELLS.A.S., has the obligation to rectify and update at request of the owner, the information of this one that turns out to be incomplete or inaccurate, in conformity with the procedure and the terms above mentioned. In the matter the following things will be taken into consideration:

WENDELL S.A.S., has full freedom of enabling mechanisms that facilitate to it the exercise of this right.

Suppression of Information. The owner has the right, at all time, to request WENDELL S.A.S., the suppression (elimination) of his/her personal information when:

- Thinks that the information is not being treated in conformity with the principles, duties and obligations foreseen in the Law 1581 of 2012.
- Have stopped being necessary or pertinent for the purpose for which they were gathered.
- The period necessary for the fulfillment of the purposes for those who were gathered has been exceeded

This suppression involves the total or partial elimination of the personal information in agreement with the requested by the owner in the records, files, databases or treatments performed by WENDELL S.A.S. The owner must warn that the right of cancellation is not absolute and the person in charge can deny the exercise of the same one when:

- A. The request of suppression of the information will not proceed when the holder has a legal or contractual duty to remain in the database.
- B. The elimination of information prevents judicial actions or administrative, linked to fiscal obligations, the investigation and pursuit of crimes or the update of administrative sanctions.

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C. The information is necessary to protect the interests juridically protected of the owner; to perform an action depending on the public interest, or to fulfill an obligation legally acquired by the owner

In case it turns out to be proceeding, the cancellation of the personal information, WENDELL S.A.S., must realize operatively the suppression in such a way that the elimination does not allow the recovery of the information.

V. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION.

When information is sent or data is transferred to another country always one will have to rely on the authorization of the owner of the information that it is an object of transfer. Except that the law says the opposite, it is presupposed and necessary the existence of the above mentioned authorization to carry out the international traffic of information. In this respect, before sending personal information to another country, the people forced to fulfilled this policy will have to check that one relies on the previous, express and unequivocal authorization of the owner that would allow to transfer his /her personal information.

The above mentioned transfer of the personal information is performed only to third parties with whom WENDELL S.A.S., has contractual, commercial and / or legal binding.

VI. IDENTIFICATION OF THE DATABASES AND PERIOD OF VALIDITY:

· DB Suppliers.

Type of treatment: Compilation, update, conservation and transfer of personal information.

Purpose: Invoicing, contracting, analysis, evaluations and selection of suppliers and / or potential contractors.

Period of validity: withdraw of the contact, duration of the contractual relation and legal duty.

· DB human Talent.

Type of treatment: Compilation, update, conservation and transfer of personal information.

Purpose: labor Relation. Provision of services, communications of law to the personnel. Access to benefits for labor well-being.

Period of validity: I withdraw of the employee, duration of the contractual relation and legal duty opposite to former employees.

· DB Clients WENDELL S.A.S. (People and companies)

Type of treatment: Compilation, update, conservation, transfer, automatization.

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Purpose: Service of training and certification of formation, commercial exploration, sending of advertising and marketing.
Period of validity: validity of WENDELL S.A.S. society



VII.FORCE AND UPDATE OF THE POLICIES.

The present policies apply from January 1, 2016.

As a general rule, the term of the authorizations on the use of the personal information for the clients and / or users is understood by the term of the commercial relation or of the link to the service and during the exercise of the corporate purpose of the company.

The authorizations on the information of the clients and / or users will be able to end for will of the same ones at any time. If the person is an active client of WENDELL S.A.S., his/her information will not be able to be used for anything different from the presentation of the product or service and for the offer of posterior renovations when the service has this modality.

When the terms of the policies of privacy of any of the services or products contracted by an owner, change in their essence as a general rule, in the services that have the option of renovation the new authorization will be obtained in this new one. For other cases, the authorization will be obtained in the form established for every policy or notice of privacy or across the usual way of contact between the company and the owners.

Any substantial change in the policies of Treatment, will be communicated in an opportune form to the owners of the information through the habitual means of contact and / or through: The web www.wendellservices.com.co or by e-mail sent to the holders, for the owners who do not have access to electronic means or those to which it is not possible to contact, Wendell will communicate across notices opened in the web site or in the headquarters of the company.

The communications will be sent as minimum, ten (10) days before implementing the new policies and / or substantial update of the same one.

As a general rule the term of the authorizations on the use of the personal information is understood by the term of the commercial relation or of the bond to the service and during the exercise of the corporate purpose of the company.

DIANA CLAVIJO
Wendell SAS.

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