	POLITICAL AND ORGANIZATIONAL	Code: CH.PO.006
	PROCESSING OF DATA POLICY	Version: 003
Approved: Manager	Reviewed: Manager	Created by: External consultant

DATA PROCESSING POLICY

PARAPENTE CHICAMOCHA receives, transmits and treats Personal Data for the development of its missionary and support activities, for which it commits itself to its clients, collaborators, citizens and other interested parties to design, implement, inform and maintain the mechanisms established in the Law 1581 of 2012 (Ley 1581 de 2012) protected by Article 15 of the Political Constitution (Artículo 15 de la Constitución Política) and other relevant regulations, in order to guarantee their right to know, update and rectify the information that has been collected on them in databases. In the same way it undertakes to ensure legality, privacy and good name in the treatment of this information, consequently all actions will be governed by the principles of legality, purpose, freedom, veracity or quality, transparency, access and restricted circulation, security and confidentiality.

IDENTIFICATION OF DATA PROCESSING MANAGER

Name or Business name		PARAPENTE CHICAMOCHA SAS
Place of residence		San Gil - Santander
Address		Carrera 10 No. 8-33
E-mail		info@parapentechicamocha.com
Responsible telephone	Resident	7243839
	Mobile	3153576482


TREATMENT AND PURPOSE OF THE DATA

PARAPENTE CHICAMOCHA will perform the Processing (Collection, Storage, Use, Management or Suppression) of the personal data in accordance with the conditions established by the owner, the law or the public entities to fulfil in particular the activities of its social object as may be the contracting, execution and commercialization of the goods and services of **PARAPENTE CHICAMOCHA**.


The processing of personal data may be done through physical, automated or digital media according to the type and form of collection of personal information.

PARAPENTE CHICAMOCHA may also process Personal Data, among others, for the following purposes:

- To exercise its right to know enough to the user with whom it intends to establish relationships, provide services, and assess the present or future risk of the same relationships and services.

	POLITICAL AND ORGANIZATIONAL	Code: CH.PO.006
	PROCESSING OF DATA POLICY	Version: 003
Approved: Manager	Reviewed: Manager	Created by: External consultant

- To carry out the necessary procedures for the development of the pre-contractual, contractual and post-contractual stage with **PARAPENTE CHICAMOCHA**, with respect to any products or services offered by **PARAPENTE CHICAMOCHA**, whether or not acquired or with respect to any underlying business relationship with it, As well as comply with Colombian or foreign law and the orders of judicial or administrative authorities;
- To carry out marketing, sales and promotional activities, telemarketing, customer service, brand activation, prizes and promotions, directly or through third parties derived from commercial alliances or any link;
- To implement strategies for relationships with customers, suppliers, shareholders and other third parties with whom the Company has contractual or legal relationships;
- To make invitations to events, to improve products and services or to offer new products, and all those activities associated with the commercial relationship or existing link with **PARAPENTE CHICAMOCHA**, or whatever it may have;
- To manage procedures (requests, complaints and claims), carry out satisfaction surveys regarding the goods and services of **PARAPENTE CHICAMOCHA** or related companies and commercial partners of **PARAPENTE CHICAMOCHA**;
- To disclose, transfer and / or transmit personal data inside and outside the country to the parent companies, affiliated or subsidiaries of **PARAPENTE CHICAMOCHA** or to third parties as a result of a contract, law or lawful link that requires it or to implement computer services in Cloud.
- The data collected or stored about the employees of **PARAPENTE CHICAMOCHA** by filling out forms, by telephone, or with the delivery of documents (resumes, attachments) will be treated for everything related to legal or contractual labour issues. Accordingly, **PARAPENTE CHICAMOCHA** will use personal data for the following purposes: (1) To compliance with laws, such as labour law, social security, pensions, occupational risks, family compensation funds (Social Security) and taxes; (2) To comply with the instructions of the competent judicial and administrative authorities; (3) To implement labour and organizational policies and strategies. These purposes will apply to the data collected or stored about the employees of **PARAPENTE CHICAMOCHA** by filling out forms, by phone, or with the delivery of documents (resumes, attachments) will be treated for everything related to labour issues of order Legal or contractual.
- To sort, classify, divide or separate the information provided by the data holders.
- To verify, corroborate, validate, investigate or compare the information provided by the data holders, with any information they may legitimately have, such as business relationships.
- To access, consult, compare and evaluate all the information that the holder has stored in the databases of any credit, financial, judicial or security risk, state or private, national or foreign, or any commercial or service database, which allows to establish in a comprehensive and historical manner, the behaviour that as debtor, user, client, guarantor, endorser, affiliate, beneficiary, subscriber, taxpayer and / or holder of financial, commercial services or of any other nature.
- For the purposes of security of people, goods and facilities of **PARAPENTE CHICAMOCHA** may be used as evidence in any type of process, regarding data (i) collected directly on the premises, (ii) taken from the documents they provide the employee and (iii) obtained from the video recordings that are carried out inside or outside the facilities of

	POLITICAL AND ORGANIZATIONAL	Code: CH.PO.006
	PROCESSING OF DATA POLICY	Version: 003
Approved: Manager	Reviewed: Manager	Created by: External consultant

PARAPENTE CHICAMOCHA. These will be used for the safety of the people, goods and facilities of **PARAPENTE CHICAMOCHA** and may be used as proof for any type of process.

- Know, store and process all the information provided by data holders in one or more databases, in the format that they deem most convenient.
- Perform all tax, accounting, tax and billing procedures.


RIGHTS OF THE DATA HOLDERS

The holders of the information have the right to:

1. To know, update and rectify the personal data by **PARAPENTE CHICAMOCHA**, after requesting through the established tools. It is necessary to establish previously the identification and to prevent unauthorized third parties from accessing the data of the holder of the data. This right may be exercised, inter alia, against partial, inaccurate, incomplete, fractioned, misleading, or those which Processing is expressly prohibited or has not been authorized.
2. To request proof of the authorization granted to **PARAPENTE CHICAMOCHA** unless expressly excepted as a requirement for the Data Processing, in accordance with the provisions of article 10 of Law 1581 of 2012 (Artículo 10 de la Ley 1581 de 2012).
3. To be informed by **PARAPENTE CHICAMOCHA**, upon request, regarding the use that it has given to his/her personal data.
4. To submit to the Superintendency of Industry and Commerce (Superintendencia de Industria y Comercio) complaints for violations of Law 1581 - 2012 (Ley 1581 de 2012) and other rules that modify, add or complement.
5. To revoke the authorization and / or request suppression of the data when in the Data Processing the principles, rights and constitutional and legal guarantees are not respected and there is no legal or contractual duty that requires him/her to remain in the database or file of **PARAPENTE CHICAMOCHA**. The revocation and / or suppression shall proceed when the Superintendency of Industry and Commerce (Superintendencia de Industria y Comercio) has determined that in the Data Processing the Person in Charge has incurred conduct contrary to this law and the Constitution.
6. To access free of charge, through the channels provided by **PARAPENTE CHICAMOCHA**, to personal data that have been processed.

PROCEDURES FOR THE DATA HOLDERS TO EXCEED THEIR RIGHTS

The following is a detailed list of procedures for data owners to exercise the rights to know, update, rectify and delete information or revoke the authorization.

	POLITICAL AND ORGANIZATIONAL	Code: CH.PO.006
	PROCESSING OF DATA POLICY	Version: 003
Approved: Manager	Reviewed: Manager	Created by: External consultant

PEOPLE TO WHOM THE INFORMATION MAY BE PROVIDED.

The rights of the holders may be exercised by the following persons legitimized in accordance with Article 20 of Order 1377 of 2013 (Artículo 20 del Decreto 1377 de 2013):

- By the holder, who must prove his/her identity in sufficient form by the different means that it makes available to **PARAPENTE CHICAMOCHA**.
- For their successors, who must prove such quality (status).
- By the representative and / or proxy of the holder, after accreditation of the representation or empowerment.
- By stipulation in favour of another or for another.

The rights of children and adolescents shall be exercised by those persons who are empowered to represent them (parents – tutor).

REQUESTS

All the queries that people authorize to know the personal data of the holder that rests in **PARAPENTE CHICAMOCHA** will be address **EXCLUSIVELY** through the tools that **PARAPENTE CHICAMOCHA** has destined for the effect. In any case it is necessary to leave proof of the following:


1. Date of receipt of the request.
2. Identity of the applicant

Once the identity of the holder is verified, it will be supplied the personal data linked to the holder. The response to the query must be communicated to the applicant within a maximum term of ten (10) business days from the date of receipt of the same. When it is not possible to attend the consultation within that term, the interested party will be informed, stating the reasons for the delay and indicating the date of the consultation, which in no case may exceed the five (5) business days following the expiration of the first term.

In order to adequately deal with the queries, it will be necessary to have the identification of who, in accordance with the law, is entitled to the consultation and / or claim on personal data.

CLAIMS

Claims that have the purpose of correcting, updating, deleting data or making a complaint for the alleged breach of any of the duties established for the data protection regime must

	POLITICAL AND ORGANIZATIONAL	Code: CH.PO.006
	PROCESSING OF DATA POLICY	Version: 003
Approved: Manager	Reviewed: Manager	Created by: External consultant

be submitted through an application addressed to **PARAPENTE CHICAMOCHA** containing the following information:

- Name and identification of the holder of the data or the person legitimized.
- Accurate and complete description of the facts that cause the claim.
- Physical or electronic address to send the response and inform about the status of the process.
- Documents and other relevant evidence that you want to assert.

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

Once the complete complaint has been received, a legend that says "Complaint in process" will be included in the database and the reason for it, within a period of no more than two (2) business days. This legend must be maintained until the claim is settled. The maximum term to attend the claim will be fifteen (15) business days from the day after the date of receipt. When it is not possible to deal with the claim within that term, the interested party will be informed of the reasons for the delay and the date on which their claim will be dealt with, which in no case may exceed eight (8) business days following the expiration of the first due date.


PERSON RESPONSIBLE FOR THE PROTECTION OF PERSONAL DATA.

For the full and effective exercise of the rights that the data holders are entitled to, **PARAPENTE CHICAMOCHA** has provided as a data protection function to **SERGIO ANDRÉS GUTIÉRREZ GÓMEZ** to whom all queries, complaints and/or claims will be addressed to the Mail info@parapentechicamocha.com.

VALIDITY AND TERM

This policy is effective since June 29, 2017.

The databases will have a validity equal to the period in which the purpose or purposes of the treatment in each database are maintained.

	POLITICAL AND ORGANIZATIONAL	Code: CH.PO.006
	PROCESSING OF DATA POLICY	Version: 003
Approved: Manager	Reviewed: Manager	Created by: External consultant

POLICY ADJUSTMENTS

With the purpose to maintaining the validity of this Policy, **PARAPENTE CHICAMOCHA**, may adjust and modify it, indicating the date of the update on the website or by using other means, such as data messages, mails, physical materials at the points Sales etc.

When there are substantial changes in the content of the Data Processing Policies referred to the identification of the Responsible person and the purpose of the processing of the personal data, which may affect the content of the authorization, **Parapente Chicamocha** will communicate such changes to the holder before or at the latest when implementing the new policy and will proceed to the process of a new authorization when the change refers to the purpose of the Data Processing.



SERGIO ANDRÉS GUTIÉRREZ GÓMEZ
Company Legal Representative
Date 29.06.2017, version 2