

1. WHO ARE WE?

ICOMALLAS S.A. (hereinafter the "**Company**" or "**Icomallas**"), is a commercial company registered with the Chamber of Commerce of Cali identified with NIT. 805.007.404-4.

The Company is engaged in the import, export, production, distribution and marketing of metal products, especially mesh. Our main customers are the agricultural, construction, residential, commercial and infrastructure sectors.

For the purposes of this Privacy Policy, the Company's contact details are as follows:

Company Name	ICOMALLAS S.A.
NIGHT	805.007.404-4
Address	Calle 36 No. 8^a-36 Cali, Valle del Cauca.
Email	datos.personales@icomallas.com
Website	www.icomallas.com

2. PERSONAL DATA PROCESSING POLICY

For **Icomallas** , your privacy is paramount.

This policy will explain **Icomallas' approach** to processing the personal data of third parties with whom we interact through our channels, the type of data we will process and the conditions under which the personal data you have provided to us will be safeguarded. **Icomallas** is committed to complying at all times with the regulations in force in Colombia regarding the protection of personal data, guaranteeing the exercise of its rights of habeas data.

The purpose of the Processing Policy is to protect the constitutional right of Habeas Data that all people have to know, update, and rectify the personal information that has been collected and stored in the different databases of **Icomallas**. Personal Data will only be collected and processed when previously authorized by its owner, and its correct treatment is guaranteed. Likewise, it details the general corporate guidelines that are taken into account in order to protect the personal data of the holders, the purposes of processing the information, the area responsible for dealing with complaints and claims, and the procedures that the owners of the information must exhaust to know, update, rectify and delete the information, as well as their respective service channels.

The personal data subject to processing must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fragmented or misleading personal data is prohibited.

Each person who has a relationship with **Icomallas** that involves handling personal data must comply with the technical, human and administrative measures established by the entity to provide security to personal data by preventing its adulteration, loss, consultation, use or unauthorized or fraudulent access.

In the processing, the right of the owner to obtain at any time and without restriction, information about the existence of data concerning him/her, must be guaranteed.

Access to personal data will only be allowed to individuals who are required to access it in accordance with this Policy and the Law.

All persons involved in the processing of personal data that are not public are obliged to guarantee the confidentiality of the information, even after the end of their relationship with some of the tasks included in the Processing. In accordance with the foregoing, Icomallas may only provide or communicate Personal Data when this corresponds to the development of the activities authorized by Law.

3. DEFINITIONS

- A. AUTHORIZATION:** Prior, express and informed consent of the owner to carry out the processing of their personal data.
- B. PRIVACY NOTICE:** Verbal or written communication generated by the data controller, and addressed to the data subject for the processing of their personal data. Communication sent in physical, electronic or any other format in which the owner is informed about the existence of the information processing policies that will be applicable to him/her, the way to access them and the purposes of the treatment that is intended to be given to the personal data.
- C. DATABASE:** Organized set of personal data that are subject to processing.
- D. SUCCESSOR:** Person who has succeeded others by reason of the death of this (heir).
- E. COOKIES: Cookies** are files that allow the **Company** to know the activity you carry out as a user in relation to the use of and access to the website. The purpose of these files is to establish usage metrics and most visited content (User Experience).
- F. ESSENTIAL DATA:** These are understood as those Personal Data of the owners that are essential to carry out the commercial, work or personal activity that they have with the owners of the information. The data of an essential nature must be provided by the holders of these or those entitled to exercise these rights. Sensitive data are excluded from this definition.

- G. PERSONAL DATA:** Any information linked to or that can be associated with one or more specific or determinable natural persons.
- H. PRIVATE DATA:** It is the data that, due to its intimate or reserved nature, is only relevant to the owner.
- I. PUBLIC DATA:** It is the data that is not semi-private, private or sensitive. Public data includes, among others, data relating to the marital status of individuals, their profession or trade, and their status as a merchant, public servant, or private servant. By their nature, public data may be contained, inter alia, in public registers, public documents, official gazettes and gazettes, and duly enforceable court judgments that are not subject to confidentiality.
- J. SEMI-PRIVATE DATA:** Semi-private data is data that is not intimate, reserved, or public in nature and whose knowledge or disclosure may be of interest not only to its owner but also to a certain sector or group of people or to society in general, such as financial and credit data, commercial activity or services.
- K. SENSITIVE DATA:** Sensitive data is understood to be data that affects the privacy of the owner or whose improper use may lead to discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions, social or human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties. as well as data related to health, sex life, and biometric data, such as photographs, recordings of video surveillance systems, among others.
- L. OPTIONAL DATA:** These are the data that the Company requires to offer its additional products or services for the free development of its corporate purpose.
- M. DATA PROCESSOR:** Natural or legal person, public or private, who by itself or in association with others, processes personal data on behalf of the data controller.
- N. PERSONAL DATA PROTECTION LAW:** Law 1581 of 2012 and its decrees or the rules that modify, complement or replace them.
- O. HABEAS DATA:** The right of any person to know, update and rectify the information that has been collected about them in the database and in the archive of public and private entities.
- P. DATA CONTROLLER:** Natural or legal person, public or private, who by itself or in association with others, decides on the database and/or processing of personal data.

- Q. NATIONAL REGISTRY OF DATABASES:** The National Registry of Databases (RNBD) is the public directory of the Databases subject to Processing that operate in the country and will be administered by the Superintendence of Industry and Commerce and will be freely consulted by citizens.
- R. OWNER:** Natural person whose personal data is subject to processing.
- S. PROCESSING:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- T. TRANSFER:** The transfer of Personal Data takes place when the controller and/or processor of Personal Data, located in Colombia, sends the information or Personal Data to a recipient, who in turn is the Data Controller and is located inside or outside the country.
- U. TRANSMISSION:** Processing of Personal Data that involves the communication of these within or outside the territory of the Republic of Colombia when it has the purpose of carrying out a Processing by the processor on behalf of the responsible party.

4. PRINCIPLES APPLICABLE TO THE PROCESSING OF YOUR PERSONAL DATA

The processing of personal data carried out by **Icomallas** will be subject to the following principles:

- A. PRINCIPLE OF LEGALITY:** The Processing of Personal Data is a regulated activity that must be subject to the provisions of the law and the other provisions that develop it.
- B. PRINCIPLE OF PURPOSE:** The processing must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the owner. **Icomallas** will limit itself to processing personal data that are pertinent and appropriate for the purpose for which they were collected or requested. You will always be informed of the reason for requesting the information and the specific use that will be given to it.
- C. PRINCIPLE OF FREEDOM:** The Processing may only be exercised with the prior, express, and informed consent of the owner. Personal Data may not be obtained or disclosed without prior authorization, in the absence of a legal or judicial mandate that relieves consent.
- D. PRINCIPLE OF TRUTHFULNESS OR QUALITY:** The information subject to Processing must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fragmented or misleading data is prohibited.
- E. PRINCIPLE OF TRANSPARENCY:** In the Processing, the right of the Owner to obtain from the Controller or the Processor, at any time and without restrictions, information about the existence of Personal Data concerning him/her must be guaranteed.
- F. PRINCIPLE OF ACCESS AND RESTRICTED CIRCULATION:** The Processing is subject to the limits that derive 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 Owner and/or by the persons provided for by law. Personal Data, except for public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted

knowledge only to the owners or third parties authorized by law.

- G. SECURITY PRINCIPLE:** The information subject to processing by **the Company** must be handled with the technical, human and administrative measures that are necessary to provide security to the records, preventing their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- H. PRINCIPLE OF CONFIDENTIALITY:** **The Company** is obliged to guarantee the confidentiality of Personal Data, even after the end of its relationship with any of the tasks included in the Processing, being able to only provide or communicate Personal Data when this corresponds to the development of the activities authorized by law.
- I. PRINCIPLE OF DEMONSTRATED RESPONSIBILITY:** That which is based on the approach of recognition and commitment of organizations in order to increase the standards of protection to procure and guarantee to individuals an adequate treatment of personal data. This principle means for us an obligation to be accountable for, accept responsibility for, and disclose the results in a transparent manner.

5. RIGHTS OF PERSONAL INFORMATION OWNERS AND PROCEDURE APPLICABLE FOR ITS EXERCISE.

5.1. WHAT ARE YOUR RIGHTS AS THE OWNER OF PERSONAL DATA?

The owner of the personal data has the following rights:

- A.** Know, update and rectify your personal data before **Icomallas** in its capacity as data controller. This right may be exercised, among others, against partial, inaccurate, incomplete, fragmented, misleading data, or data whose processing is expressly prohibited or has not been authorized
- B.** Request proof of the authorization granted to **Icomallas** except when expressly exempted as a requirement for treatment (cases in which authorization is not necessary).
- C.** To be informed by **Icomallas**, upon request, regarding the use it has given to their personal data.
- D.** To file complaints with the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and the other regulations that amend, add to or complement it.
- E.** Revoke the authorization and/or request the deletion of personal data when the Processing does not respect the constitutional and legal principles, rights and guarantees.
- F.** To have free access to your personal data that has been processed.

5.2. WHICH ONES SOUND THE RIGHTS SPECIALS OF THE CHILDREN, GIRLS AND TEENAGERS?

Treatment will ensure respect for the prevailing rights of children and adolescents. **The Company**

will not process the personal data of children and adolescents, except for those personal data that are of a public nature.

5.3. HOW CAN YOU EXERCISE YOUR RIGHTS OVER YOUR PERSONAL DATA?

In development of the constitutional guarantee of Habeas Data with respect to the rights mentioned in the previous section by the Owner of the personal data, his successors, legal representatives and/or attorneys-in-fact, **Icomallas** will enable access channels for the holders.

All communications, queries, complaints and/or claims must be addressed to the Personal Database Protection Officer or the Compliance Area of **Icomallas** by this means:

- 1) **Electronic service:** The Data Subject may make the request by mail: datos.personales@icomallas.com
- 2) **Face-to-face Attention:** Calle 36 No. 8 a 36 Cali, Office of Internal Control.

Your rights can be exercised in the following way:

- A. **On your own behalf:** You exercise your right directly by making the query or claim to **Icomallas**.
- B. **Through a proxy:** You exercise your right through a proxy to **Icomallas**. For these purposes, you must attach a copy of the power of attorney with the request. If the request is submitted by a person who is not the owner of the personal information, without complying with the presentation of the appropriate document that supports the representation, it will be considered **Exercise of the right of minors:** Minors must exercise their right of Habeas Data through someone who accredits their legal representation.
- C. By the Successors of the Owner, who must prove such status.
- D. as not filed and no response will be given to said requirement.

6. WHAT ARE THE DUTIES OF ICOMALLAS?

Without prejudice to the guidelines and directives of this Policy, **Icomallas** has the following duties:

- A. Guarantee to the Owner, at all times, the full and effective exercise of the right of Habeas Data.
- B. Request and keep a copy of the respective authorization granted by the Owner.
- C. Duly inform the Owner about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
- D. Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- E. Ensure that the information is truthful, complete, accurate, up-to-date, verifiable and understandable.
- F. Update the information, duly notifying the Data Processor of all the news regarding the data previously provided and adopt the necessary measures to keep the information up to date.
- G. Rectify personal data when incorrect and communicate the relevant information to the data processor.
- H. Those in charge will only provide the information that has been authorized by the owner.
- I. Require the data processor at all times to respect the security and privacy conditions of the owner's information.
- J. To process the queries and claims formulated in the terms indicated by law.
- K. Adopt an internal manual of policies and procedures to ensure adequate compliance with this law, and especially the attention to queries and complaints.
- L. Inform the data processor when certain information is under discussion by the owner, once the claim has been filed and the respective procedure has not been completed.
- M. Inform, at the request of the owner, about the use given to their personal data.

- N. Inform the data protection authority when there are violations of security codes and there are risks in the management of the information of the holders.
- O. Comply with the requirements and instructions given by the Superintendence of Industry and Commerce on the particular subject.
- P. Use only data whose Processing is previously authorized in accordance with the provisions of Law 1581 of 2012.
- Q. Inform the owner of the information of the rights that assist him or her
- R. Inform the owner of the information of the identification, physical or electronic address and telephone number of Icomallas as the Data Controller.
- S. Inform the holder of the optional nature of the questions asked, when they deal with sensitive data or the data of children and adolescents

7. WHAT ARE THE DUTIES OF ICOMALLAS PROCESSORS IN THE PROCESSING OF YOUR PERSONAL DATA?

Without prejudice to the guidelines and directives of this Policy, processors have the following duties:

- A. To guarantee to the Owner, at all times, the full and effective exercise of the right of habeas data;
- B. Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- C. Carry out the timely updating, rectification or deletion of Personal Data in the terms provided for in the law and this Policy.
- D. Update the information reported by the Company within five (5) business days from its receipt.
- E. To process the queries and claims made by the Data Controllers under the terms provided for in this policy.
- F. Adopt an internal manual of policies and procedures to ensure adequate compliance with the law, and especially for the attention to inquiries and complaints by the holders.
- G. Register in the database the legend "Claim in process" in the manner established in this policy.

- H. Insert in the database the legend "information under judicial discussion" once notified by the competent authority about judicial proceedings related to the quality of Personal Data
- I. Refrain from circulating information that is being disputed by the Owner and whose blocking has been ordered by the Superintendence of Industry and Commerce.
- J. Allow access to personal data only to people who can have access to it.
- K. Inform the Superintendence of Industry and Commerce when there are violations of security codes and there are risks in the management of the information of the Holders.
- L. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

8. WHAT INFORMATION AND PERSONAL DATA DO WE COLLECT?

Icomallas collects information and your personal data in order to execute our obligations, and improve the provision of our services, as well as comply with our legal obligations to report to the appropriate authorities.

In some cases, information (including personal data) is provided by you by registering or providing information when using our services. In addition, we collect them automatically when you use or access our website, service channels, and other systems of interaction with our customers. The personal data we request from you are those that are strictly necessary for the purpose that we explain to you in the authorization for the processing of personal data. We will not force you to hand over sensitive personal data.

Here are the types of data we collect:

- 8.1.** Information you provide to us directly when registering or using our services:
 - A. Number
 - B. Current identification number or document number.
 - C. Contact information (such as phone number, address, email address).
 - D. Payment method (excluding bank details and other transactional personal data).
 - E. Transactional history (purchases, payments, returns, inquiries, billing and tax information, password or user ID of your digital account).

8.2. information that we process automatically in respect of your use of and access to the Website.

- A.** Information about the devices or computers from which the Website is accessed and other automatically captured data (such as browser or operating system type or version, settings, and settings).
- B.** Internet IP address that you use when you connect to our services or when you browse the Website.
- C.** History of transactions through the Website (Purchases, payments, disclosure, questions, billing and tax information, password or user ID of your digital account)
- D.** Information about your location, which may be used to offer you discounts, adjust currency, shipping rates, among others.
- E.** If you did not register or access through your account, the Company will only collect and store, in addition to the information indicated in this point, your telephone numbers and your email address.

9. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only store personal data for as long as necessary to fulfill the purpose for which it was collected, to comply with regulatory or legal requirements, or for the legal limitation period of potential legal or contractual liability. Once the period has expired, the data will be deleted or anonymized in such a way that no person can be individualized, as allowed by the regulations of each country.

10. AUTOMATED DECISIONS AND PROFILING

In order to offer a better experience in the use and access of the **Icomallas** website, we may use tools that help us to be more efficient through techniques known as "artificial intelligence", "machine learning" or "Big Data", such as fraud prevention, personalization and advertising services or automated cybersecurity mechanisms. Automated decisions are those that are made based on the use of algorithms and computer programs, without any human being intervening in the decision-making process.

Profiling is the assessment of some personal aspects, such as your interests, preferences, behaviours or location, which is carried out through automated processing of personal data with statistical procedures. As a result of this processing, we may send you personalised communications, or display them to you within our platforms, that we believe may be of interest to you.

You have the right to request a review of a decision based on the automated processing of personal data and information.

11. ADVERTISING, COOKIES, AND OTHER TECHNOLOGIES

The user expressly acknowledges and agrees that **Icomallas** may use a behavioral monitoring system through the use of "cookies", "web indicators" and other similar monitoring technologies.

These technologies are used in order to know the interests and behaviors of those who visit or are users of our website and in this way, give them a better service or provide them with related information. We also use the information obtained through cookies to analyse the pages browsed by the visitor or user, the searches made, improve our commercial and promotional initiatives, display advertising or promotions, Interest banners, news about **Icomallas**, improve our content and article offerings, personalise said content, presentation and services, as well as promote and enforce the rules and security of the site; We also use them so that the user does not have to enter their password so often during a browsing session, count and corroborate records, user activity and other concepts for commercial agreements, always with the aim of installing cookies, benefiting the user who receives them, and that they will not be used for purposes outside of **Icomallas**. We also store cookies so that we can provide a more interactive experience on the site, based on user actions.

Your personal data obtained through these technologies will not be transferred to third parties in a manner other than those described in this Policy.

You should know that the storage, permanence and existence of cookies on your computer or device depends on your exclusive will and can be deleted whenever you wish. To know how to delete cookies from the system, it is necessary to review the help section of the browser. You can therefore at any time delete stored cookies, set your browser to request approval before storing cookies, or directly prevent cookies from being stored. This procedure is done differently in different browsers and should be done in each browser you use.

12. HOW DO WE OBTAIN YOUR CONSENT TO DATA PROCESSING PERSONAL?

Icomallas will always obtain authorization for the processing of the personal data of the owners by any means which can be consulted subsequently, and will request from those who transfer or transmit the personal data evidence of having obtained it, except when there is a verification of one of the exceptions under which consent is not required pursuant to Article 10 of Law 1581 of 2012. In any case, personal data will always be treated in accordance with this policy, the law and the constitutional principles that protect them.

The authorization for the processing of personal data will always include information regarding the personal data that will be collected and the purpose for which they will be processed. Where there is a material change to this Policy that affects the authorization, we will let you know in order to obtain a new authorization. In the event that **sensitive personal data is requested**, we will inform you that you are not obliged to provide it.

The processing of personal data of children and adolescents is prohibited, except when it is data of a public nature, and when such processing complies with the following parameters and/or requirements:

- A. That they respond to and respect the best interests of children and adolescents.
- B. That their fundamental rights are respected.

Once the above requirements have been met, the legal representative of the children or adolescents shall grant authorization, after the minor has exercised his or her right to be heard, an opinion that shall be assessed taking into account the maturity, autonomy and capacity to understand the matter. The Company will ensure the appropriate use in the Processing of the Personal Data of children and adolescents.

12.1. EVENTS IN WHICH THE AUTHORIZATION OF THE OWNER OF THE PERSONAL DATA IS NOT NECESSARY

The authorisation of the owner of the information will not be necessary in the following cases:

- A. Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- B. Public data.
- C. Cases of medical or health emergency.
- D. Processing of information authorized by law for historical, statistical or scientific purposes.
- E. Data related to the Civil Registry of individuals.
- F. Any other established in the Law.

13. PROCESSING OF SENSITIVE PERSONAL DATA

We will only process sensitive personal data for what is strictly necessary, requesting the prior and explicit consent of the owners (legal representatives, attorneys-in-fact, successors) and informing them of the exclusive purpose for their processing. We will process sensitive data in the following circumstances:

- A.** The processing has been expressly authorized by the owner of the sensitive data, except in cases where, by law, the granting of such authorization is not required.
- B.** The processing is necessary to safeguard the vital interest of the owner and the owner is physically or legally incapacitated. In these events, the legal representatives must grant the authorization.
- C.** The processing refers to data that is necessary for the recognition, exercise or defense of a right in a legal process.
- D.** Treatment that has a historical, statistical or scientific purpose or, within the framework of improvement processes; the latter, provided that measures are adopted to suppress the identity of the owners or the data is dissociated, i.e., the sensitive data is separated from the identity of the owner and is not identifiable or the owner of the sensitive data or data cannot be identified.

Icomallas always:

- A.** Please inform you that as it is sensitive data, you are not obliged to authorize its processing.
- B.** It explicitly informs you, in addition to the general requirements of the authorization for the collection of any type of personal data, which data subject to processing are of a sensitive nature, the purpose applied, and obtain your explicit consent.
- C.** You will refrain from conditioning any activity on you providing us with sensitive personal data (unless there is a legal or contractual cause to do so).

14. HOW WILL WE PROCESS YOUR PERSONAL DATA AND FOR WHAT PURPOSES?

The Processing of Personal Data of collaborators, partners, shareholders, customers, suppliers, employees and others; It will be framed in the legal order and by virtue of the condition of **Icomallas** as the entity responsible for the information and will be all those necessary for the following purposes:

- A.** Identify and contact you.
- B.** Verify your identity in accordance with legal requirements.
- C.** To provide you with the products and/or benefits that you request to contract with us.
- D.** To compile and maintain a record of the transactions you make, as well as to inform you about them and to follow up on them.
- E.** To attend to your request, complaints and suggestions, as well as to provide support.
- F.** Judicial and/or extrajudicial collection.
- G.** Coordinate the delivery of products advertised and sold on the Website.
- H.** To provide you with the services and features that best suit your needs and to personalize our services to make your experiences with the Website as comfortable as possible.
- I.** Develop internal studies on your interests and behavior, to offer you better products, as well as carry out statistical studies.
- J.** Create profiles by analyzing various variables, such as behavior and interactions within the platform, analysis and prediction of economic capacity, preferences, interests, transaction history, behavior, and location, among others. The foregoing, to improve our commercial and promotional initiatives, show advertising or promotions and banners of interest.
- K.** To improve our commercial and promotional initiatives and to analyze the pages visited, the searches made by users, in order to improve our offer of content and articles, to personalize this content, its presentation and services.
- L.** Provide you with information through different communication channels (by email, push messages, phone calls, or any other means).
- M.** Detect and prevent fraud, abuse, and related crime to protect the safety of our users and the sustainability of the platforms.
- N.** Protect the rights of users, third parties or those of the Company.
- O.** Linking our collaborators to the social security system and attending to payments or news related to the system.

- P. Payroll payments, settlement or payment of social benefits where external entities are involved.
- Q. Consolidation of a database with profiles of candidates or collaborators for future vacancies or promotions.
- R. Third-party staff training

The use of your personal data for any other purpose that is not compatible with those detailed will be communicated to you before we proceed with its processing. The Company will retain your personal data for as long as necessary to fulfill the purposes for which it was collected.

15. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

It is very important to us to safeguard your privacy. Therefore, we do not sell or trade information that identifies users. We also do not share or transfer your personal data to third parties, except as follows:

In order to transmit your personal data to third parties located in Colombia or abroad, there must be (i) a prior, express and informed authorization from you, or (ii) a personal data transfer contract that contains at least the following:

- 1) The scope of the obligations of the person in charge of the processing of personal data.
- 2) The activities that the processor will have to perform on our behalf with your personal information.
- 3) The obligations of the person in charge with respect to the owner and **Icomallas**.
- 4) The obligation of the person in charge to comply with the obligations established in the internal guidelines of **Icomallas** and the Law.
- 5) The obligation of the person in charge to carry out the processing of personal data in accordance with the purposes authorized by the owners and with applicable legislation.
- 6) The obligation of the person in charge to process, on behalf of the controller, the personal data in accordance with the principles that protect them.
- 7) The obligation of the person in charge to safeguard the security of the databases in which personal data are contained.
- 8) The obligation of the processor to maintain confidentiality with respect to the processing of personal data.

The Company may transfer or transmit your personal data to the following persons and for the reasons stated below:

- A. Business Partners:** Companies with financial or commercial activities with which the Company has a collaborative or alliance relationship, in order to offer you promotions, products and services of such companies. In these cases, we will always ensure that confidentiality and security standards are met, by signing agreements whose purpose is the privacy of our users' personal data and compliance with applicable legislation.
- B. Service Providers:** These are third parties that we engage to provide a service at our instructions and in accordance with the provisions of this Privacy Notice, such as (a) carrier, courier and shipping companies, to deliver purchased products to you, (b) intermediary means of payment in the management of payments or insurance, to obtain payment for the contracted services or products, as well as to provide protection with respect to the products purchased, (c) computer system providers, cloud service providers, database providers and technology service providers in general, (d) advertising or marketing agencies (e) data analysis. These service providers only access information (including personal data) that is strictly necessary to provide the agreed services and may not use them for purposes other than those entrusted to them by **The Company**.
- C. Affiliates:** Companies that belong to our business group, which operate under our same internal processes and policies, whether they are controlled companies or affiliated with **The Company**, to comply with our internal regulations, prevent fraud, manage risks and facilitate the management of the website.
- D. Public authorities:** Administrative and judicial authorities that, in the exercise of their power, require information, even if there is no executive or judicial order or summons to that effect, for the purpose of: (a) assisting in the investigation and reporting of fraud, (b) safeguarding a public interest, judicial proceedings, administrative proceedings and/or dispute resolution, and (c) complying with any law, regulation, applicable legal provision, or any mandate of a competent authority duly founded and motivated.

16. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Any processing that involves the sending of personal data outside Colombian territory is considered an international transfer. The transfer of your personal data to third countries will only be carried out when there is prior, express and informed authorization from the owner, and the country has an adequate level of protection of personal data in accordance with the SIC.

However, where any of the following circumstances occur, personal data may be sent to countries that do not have an adequate level of personal data protection where:

- A.** The prior, express, informed and unequivocal authorization of the owner is obtained.
- B.** Exchange of personal medical data when there is an emergency that requires it.
- C.** Bank or stock transfers, in accordance with the legislation applicable to them
- D.** Transfers agreed within the framework of international treaties to which the Republic of Colombia is a party, based on the principle of reciprocity

- E. Transfers necessary for the execution of a contract between the Data Controller and the Data Controller, or for the execution of pre-contractual measures, provided that the Owner has the authorization of the Data Controller
- F. Transfers legally required for the safeguarding of the public interest, or for the recognition, exercise or defense of a right in a judicial process.
- G. When the SIC issues a declaration of conformity.

17. LINK TO OTHER WEBSITES

On the Website, **The Company** may include links to third-party websites, which does not indicate that they are owned or operated by the Company. It is clarified that the processing of personal data carried out by the third parties responsible for the aforementioned websites is not covered by this Privacy Notice. You further acknowledge and agree that **The Company** has no control over such websites and is not and will not be responsible for the content or services provided by such sites, or for the manner in which they process your personal data, and you enter such websites at your own risk

18. HABEAS DATA PROCEEDINGS

18.1. RESPONSIBILITY OF ICOMALLAS OFFICIALS

All Company officers shall be responsible for:

- a) Comply with the guidelines defined in this policy regarding the protection of personal data processed, which refer to customers, suppliers and workers, and any other Owner.
- b) Comply with the duties established in this document regarding the protection of personal data transmitted and received from customers, suppliers and workers.
- c) Protect and keep safe the documentation provided by customers, suppliers and employees.

18.2. PERSON OR AREA RESPONSIBLE FOR DEALING WITH REQUESTS, QUERIES AND COMPLAINTS

Icomallas has designated the Administrative Management as the area responsible for ensuring compliance with this policy within the entity headed by the LEGAL REPRESENTATIVE with the support of the Administrative Manager who manages the Personal Data of the Holders.

A committee will be established to evaluate and resolve requests, queries and complaints by the Data Subjects and to make any corrections, updates or deletions of Personal Data. The above, through the email datos.personales@icomallas.com . The committee will be made up of the Administrative Manager, IT Director, Head of Quality and Compliance Coordinator.

18.3. PROCEDURE FOR DEALING WITH PETITIONS, QUERIES AND COMPLAINTS

18.3.1. INQUIRIES:

- 1) The Owners or whoever represents them, may consult the Personal Data of the Owner who resides in the Company, who will provide all the information contained in the individual record or that is linked to the identification of the Owner.
- 2) The query will be made through the email datos.personales@icomallas.com.
- 3) The query will be answered in ten (10) business days.
- 4) Identity validation will always be performed before personal information is provided.
- 5) In the event that this is not possible, within five (5) business days of the presentation, the reasons why the query cannot be attended will be indicated.

18.3.2. CLAIMS:

The Owner or *his* or her representative who considers that the information contained in a database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the law, may file a claim with **The Company**, which will be processed under the following rules:

- A. The claim of the Owner or whoever represents him or her will be made by means of a request addressed to **The Company** by email datos.personales@icomallas.com with the identification of the Owner, the description of the facts that give rise to the claim, the address, and accompanying the documents that are to be asserted. If the claim is incomplete, the Owner or its representative will be required within five (5) days of receipt of the claim to correct the defects. If two (2) months have elapsed from the date of the request, without the Owner to whom he or she represents presenting the required information, it will be understood that he or she has withdrawn the claim.
In the event that the person receiving the complaint is not competent to resolve it, he or she shall notify the appropriate party within a maximum period of two (2) business days and shall inform the interested party of the situation.
- B. Once the claim is received by datos.personales@icomallas.com mail, it will be labeled "claim in process" and the reason for it within a period of no more than two (2) business days. This label will be maintained until the claim is decided.
- C. The maximum term for the expiration of the claim will be fifteen (15) business days from the day following the date of its receipt. When it is not possible to address the complaint within that period, the interested party shall be informed of all the reasons for the delay and the date on which his or her complaint will be addressed. Which, in no case, may exceed eight (8) business days following the expiration of the first term.

The Owner is informed that in accordance with Article 16 of Law 1581 of 2012, he/she may only file a complaint with the Superintendence of Industry and Commerce once he/she has exhausted the consultation or claim process before Icomallas or before the Data Controller or Data Processor.

18.3.3. REQUEST FOR UPDATING, RECTIFICATION AND DELETION OF DATA.

The Company will rectify and update, at the request of the Owner, the information of the Owner that turns out to be incomplete or inaccurate in accordance with the procedure and the terms indicated above, for which the Owner will send the request to the email datos.personales@icomallas.com indicating the update, rectification or deletion of the data and will provide the documentation that supports his request.

18.3.4. REVOCATION OF AUTHORIZATION AND/OR DELETION OF DATA

The Owners of the Personal Data may revoke their consent to the Processing of their Personal Data at any time, as long as it is not prevented by a legal or contractual provision, for this purpose, **The Company** will make available to the Owner the email address datos.personales@icomallas.com. If the respective legal term has expired, **Icomallas**, as the case may be, has not deleted the personal data, the owner will have the right to request the Superintendence of Industry and Commerce to order the revocation of the authorization and/or the deletion of the Personal Data. For these purposes, the procedure described in Article 22 of Law 1581 of 2012 will be applied.

18.3.5. PROVISION OF INFORMATION

The information requested by the owner or his representative will be provided via email by company policy. However, the owner may request that the information be provided by any means as required. The information provided by Icomallas will correspond in its entirety to that which rests in the database.

18.3.6. TO WHOM INFORMATION MAY BE PROVIDED

The information processed by Icomallas may be provided to the owner or to the following persons:

- A.** To the Holders, their successors or their legal representatives
- B.** To public or administrative entities in the exercise of their legal functions or by court order.
- C.** To third parties authorized by the Owner or by law.

18.3.7. SECURITY – STORAGE OF PERSONAL DATA

The company complies with industry regulations and standards regarding the security measures applicable to your personal data.

The Company is not responsible for powers of attorney and breach of its systems or databases, or for their use by unauthorized persons. **The company** is not responsible for the improper use of the information obtained by these means.

19. SCOPE OF APPLICATION

This policy shall be applicable to Personal Data registered in any Database managed by **The Company** whose owner is a natural person. Policy based on Article 17 of Law 1581 of 2012, Decree 1377 of 2013 and Law 1581 of 2012.

20. VALIDITY

This Policy will take effect on May 12, 2023 and modifies version 2.

The update of this will be carried out annually or when there are significant changes in the organization that lead to its update.

ANNEX No.1 PRIVACY NOTICE

1. WHO ARE WE?

ICOMALLAS S.A. (hereinafter the "**Company**" or "**Icomallas**"), is a commercial company registered with the Chamber of Commerce of Cali with MERCANTILE REGISTRATION 458571-4 identified with NIT. 805.007.404-4, on May 19, 1997 under No. 3524 of Book IX.

The Company is engaged in the import, export, production, distribution and marketing of metallurgical products, especially mesh, the agricultural, construction, residential, commercial and infrastructure sectors.

For the purposes of this Privacy Policy, the Company's contact details are as follows:

Company Name	ICOMALLAS S.A.
NIGHT	805.007.404-4
Address	Calle 36 No. 8^a-36 Cali, Valle del Cauca.
Email	datos.personales@icomallas.com
Website	www.icomallas.com

2. WHAT INFORMATION AND PERSONAL DATA DO WE COLLECT?

Icomallas collects information and your personal data in order to execute our obligations, and improve the provision of our services, as well as comply with our legal obligations to report to the appropriate authorities.

In some cases, information (including personal data) is provided by you by registering or providing information when using our services. In addition, we collect them automatically when you use or access our website, service channels, and other systems of interaction with our customers.

The personal data we request from you are those that are strictly necessary for the purpose that we explain to you in the authorization for the processing of personal data. We will not force you to hand over sensitive personal data.

Here are the types of data we collect:

2.1 Information you provide to us directly when registering or using our services:

- A.** Number
- B.** Current identification number or document number.
- C.** Contact information (such as phone number, address, email address).
- D.** Payment method (excluding bank details and other transactional personal data).
- E.** Transactional history (purchases, payments, returns, inquiries, billing and tax information, password or user ID of your digital account).

2.2 information that we process automatically in respect of your use of and access to the Website

- A.** Information about the devices or computers from which the Website is accessed and other automatically captured data (such as browser or operating system type or version, settings, and settings).
- B.** Internet IP address that you use when you connect to our services or when you browse the Website.
- C.** History of transactions through the Website (Purchases, payments, disclosure, questions, billing and tax information, password or user ID of your digital account)
- D.** Information about your location, which may be used to offer you discounts, adjust currency, shipping rates, among others.
- E.** If you did not register or access through your account, the Company will only collect and store, in addition to the information indicated in this point, your telephone numbers and your email address.

3. HOW WILL WE PROCESS YOUR PERSONAL DATA AND FOR WHAT PURPOSES?

The Processing of Personal Data of collaborators, partners, shareholders, customers, suppliers, employees and others; It will be framed in the legal order and by virtue of the condition of **Icomallas** as the entity responsible for the information and will be all those necessary for the following purposes:

- A.** Identify and contact you.
- B.** Verify your identity in accordance with legal requirements.

- C. To provide you with the products and/or benefits that you request to contract with us.
- D. To compile and maintain a record of the transactions you make, as well as to inform you about them and to follow up on them.
- E. To attend to your request, complaints and suggestions, as well as to provide support.
- F. Judicial and/or extrajudicial collection.
- G. Coordinate the delivery of products advertised and sold on the Website or our agencies.
- H. To provide you with the services and features that best suit your needs and to personalize our services to make your experiences with the Website as comfortable as possible.
- I. Develop internal studies on your interests and behavior, to offer you better products, as well as carry out statistical studies.
- J. Create profiles by analyzing various variables, such as behavior and interactions within the platform, analysis and prediction of economic capacity, preferences, interests, transaction history, behavior, and location, among others. The foregoing, to improve our commercial and promotional initiatives, show advertising or promotions and banners of interest.
- K. To improve our commercial and promotional initiatives and to analyze the pages visited, the searches made by users, in order to improve our offer of content and articles, to personalize this content, its presentation and services.
- L. Provide you with information through different communication channels (by email, push messages, phone calls, or any other means).
- M. Detect and prevent fraud, abuse, and related crime to protect the safety of our users and the sustainability of the platforms.
- N. To protect the rights of users, third parties or those of **Icomallas**.
- O. Linking our collaborators to the social security system and attending to payments or news related to the system.
- P. Payroll payments, settlement or payment of social benefits where external entities are involved.
- Q. Consolidation of a database with profiles of candidates or collaborators for future vacancies or promotions.

R. Staff training with third parties

S. Report in the National Registry of Databases

The use of your personal data for any other purpose that is not compatible with those detailed will be communicated to you before we proceed with its processing. The Company will retain your personal data for as long as necessary to fulfill the purposes for which it was collected.

4. RIGHTS OF PERSONAL INFORMATION OWNERS AND PROCEDURE APPLICABLE FOR ITS EXERCISE.

4.1. WHAT ARE YOUR RIGHTS AS THE OWNER OF PERSONAL DATA?

The owner of the personal data has the following rights:

- G.** Know, update and rectify your personal data before **Icomallas** in its capacity as data controller. This right may be exercised, among others, against partial, inaccurate, incomplete, fragmented, misleading data, or data whose processing is expressly prohibited or has not been authorized
- H.** Request proof of the authorization granted to **Icomallas** except when expressly exempted as a requirement for treatment (cases in which authorization is not necessary).
- I.** To be informed by **Icomallas**, upon request, regarding the use it has given to their personal data.
- J.** To file complaints with the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and the other regulations that amend, add to or complement it.
- K.** Revoke the authorization and/or request the deletion of personal data when the Processing does not respect the constitutional and legal principles, rights and guarantees.
- L.** To have free access to your personal data that has been processed.

4.2. WHICH ONES SOUND THE RIGHTS SPECIALS OF THE CHILDREN, GIRLS AND TEENAGERS?

Treatment will ensure respect for the prevailing rights of children and adolescents. **The Company** will not process the personal data of children and adolescents, except for those personal data that are of a public nature.

4.3. HOW CAN YOU EXERCISE YOUR RIGHTS OVER YOUR PERSONAL DATA?

In development of the constitutional guarantee of Habeas Data with respect to the rights mentioned in the previous section by the Owner of the personal data, his successors, legal representatives and/or attorneys-in-fact, **Icomallas** will enable access channels for the holders.

All communications, queries, complaints and/or claims must be addressed to the Personal Database Protection Officer or the Compliance Area of **Icomallas** by this means:

- 3) **Attention electronics:** TheHeadline of the given may Perform the Application by Mail: datos.personales@icomallas.com
- 4) **Face-to-face Attention:** [Calle 36 No. 8^a-36 Cali, Valle del Cauca, Internal Control Department.

Your rights can be exercised in the following way:

- E. **On your own behalf:** You exercise your right directly by making the query or claim to **Icomallas**.
- F. **Through a proxy:** You exercise your right through a proxy to **Icomallas**. For these purposes, you must attach a copy of the power of attorney with the request. If the request is submitted by a person who is not the owner of the personal information, without complying with the presentation of the appropriate document that supports the representation, it will be considered as not filed and no response will be given to said requirement.
- G. **Exercise of the right of minors:** Minors must exercise their right of Habeas Data through someone who accredits their legal representation.

ANNEX No.2 COOKIES POLICY

WHAT ARE COOKIES?

Cookies are activity files that allow **ICOMALLAS S.A.**, duly constituted, identified with the NIT 805007404-4 (the "**Company**") to know the activity carried out as a User in relation to the use and access of the Website. The purpose of these files is to establish usage metrics and most visited content (User Experience).

WHAT TYPES OF COOKIES ARE THERE?

Cookies can be classified into the following types:

By the User of cookies:

- A. **First-party cookies:** These are cookies that are stored on the User's device from a computer or domain managed by the publisher (**The company**, in this case) and from which the service requested by the User is provided.
- B. **Third-party cookies:** These are cookies that are stored on the User's device from a computer or domain that is not managed by the publisher, but by a different entity that processes the data obtained through the Cookies.

For the life cycle of Cookies:

- A. **Session Cookies:** These are temporary Cookies that remain in your browser's cookie file until you leave the website, so nothing is recorded on the User's hard drive. The information obtained through these cookies is used to analyse traffic on the website. In the long run, this allows us to improve the experience, content, and ease of use.
- B. **Persistent cookies:** These are stored on your hard drive and are read by our website whenever you visit a website. A permanent cookie has a specific expiration date. Cookies will stop working after that date. We use them, in general, to facilitate purchasing and registration services.

For the purpose

- A. **Technical cookies:** They allow the User to navigate through a website, platform or application and use the different options or services that exist on it. For example: controlling communication and data traffic, identifying the session, accessing restricted access areas, remembering the items that are part of an order, completing the purchase process of an order, making a request for registration or participation in an event, using security elements while browsing, storing content for video distribution, sound or share content on social networks.
- B. **Personalisation cookies:** They allow the User to access the service with some predefined general characteristics based on a series of criteria on the User's device such as language, the type of browser used to access the service, the regional service from which the accessed service is located, etc.
- C. **Analysis cookies:** They allow the person responsible for them to monitor and analyse the behaviour of Users on the websites or websites that may be linked to them. The information collected through this type of cookie is used to measure activity on the website, application or platform and to create browsing profiles of the users of said websites, applications *and* platforms in order to introduce improvements based on the analysis of the usage data by the Users of the service.
- D. **Advertising cookies:** They allow the management in the safest possible way of the advertising spaces that, where appropriate, **the company** has included on a website, application or platform from which it provides the requested service based on criteria such as the content edited or the frequency with which the advertisements are displayed.
- E. **Behavioural advertising cookies:** They allow the management in the most efficient way possible of the advertising spaces that, where appropriate, the publisher has included on a website, application or platform from which it provides the requested service. These cookies store information on the Users' behaviour obtained through the continuous observation of their browsing habits, which allows the development of a specific profile to display advertising based on this. It is also possible that when you visit a website or open an email containing an advertisement or promotion of our products or services, a Cookie may be placed on your browser to allow us to then show you advertising related to the search performed, to develop control of our advertisements regarding, for example, the number of times they have been viewed, what time they have met, etc.

SOCIAL NETWORKS

Finally, we inform you that social media websites also collect information regarding the content you share through their own Cookies. **The Company** has absolutely no control over social media activity. However, we remind you that they all have their own privacy and cookie policies.

OUR RECOMMENDATION

If you wish, you can disable our own Cookies, however, if you do so, some functionalities may not work properly or navigation may be more difficult.

1. If you use Google Chrome, access the "Clear browsing data" option through the "History" menu. A menu will appear where you can decide what information to delete, including Cookies.
2. If you are using Firefox, access the "Clear History" option via the "History" menu. A menu will appear where you can decide what information to delete, including Cookies.
3. If you are using Internet Explorer, access the "Delete browsing history" option through the "Tools" menu. A menu will appear where you can decide what information to delete, including cookies.
4. If you are using the Chrome browser on Android, access the "Security & Privacy" option via the "Settings" menu. A menu will appear where you can decide what information to delete, including cookies.

HOW TO DISABLE COOKIES BEFORE BROWSING OUR WEBSITES?

You can set your computer or device not to store our cookies, here's how to do it:

1. If you're using Google Chrome, go to "Customize and control Google Chrome" (usually in the upper-right corner, next to the address bar). Click the "Show Advanced Options" link and select "Content Settings." You will see the options available for Cookies.
2. If you're using Firefox, go to the "Tools" menu (usually in the menu bar, just above the address bar), click "Options," and select the "Privacy" tab. You will see the available options.
3. If you are using Internet Explorer, go to the menu. "Tools" (usually in the top right corner, to the right of the navigation tabs), click on the "Internet Options" option and, in the menu that appears, select the "Security Tab" option. You can choose one of the security levels preset by Microsoft or customize your own security level.

COOKIES POLICY AND PRIVACY POLICY

Remember that the Cookies Policy is part of the Company's Privacy Policy.

UPDATE COOKIE POLICY

The Company may unilaterally modify the Cookies Policy in the event of a change with current legislation, jurisprudential doctrine or internal criteria. Any changes made to this policy will be posted *at* this same address.

CODE: PO-CI-001

VERSION: 01

DATE: 12/05/2023

