



**Official Translator:** José Fernando Jaramillo Sanint. **Address:** Calle 70A No. 23B-34 Manizales Colombia  
**Tel:** (57) (6) 8874503 **Mobile:** (310) 404-0972 - (300) 339-46-01 **Email:** traducciones@121com.co



## Policy of treatment of information and personal data

1.

### 1. Introduction

This document includes the policies for the Treatment of Information and Personal Data adopted by ALDEAMO in compliance with the provisions of Law 1581 of 2012 and Decree 1377 of 2013, which regulates the protection of personal data and especially the care of related queries and complaints. Likewise, it defines the principles regarding Treatment and guarantees rights for the Holders of personal data. For the companies CELUMANÍA ENTRETENIMIENTO CELULAR SAS, ESTRATEGIAS MÓVILES SAS, AXESNET SAS, AND ALDEA MÓVIL SAS, all respectively responsible and/or responsible for the processing of personal data, which can all act under the ALDEAMO brand (hereinafter, all companies identified as ALDEAMO), it is very important to protect the information of our clients, users, employees and suppliers. This document contains our "General Policy for the Treatment of Information and Personal Data", and is intended to communicate what information we collect and for what purposes, how we use it, when we share it and how we protect it, as well as the rights that assist it to the holders of the information and the procedures to exercise them.

The holders of the personal data accept the treatment of their personal data in accordance with the terms of this Policy and authorize us to process it in the terms of the same when they provide the data through the different means (including our web pages or text messages via mobile devices).

### 2. Legal framework

Political Constitution, article 15.

Law 1266 of 2008

Law 1581 of 2012

Regulatory Decrees 1727 of 2009 and 2952 of 2010, Partial Regulatory Decree 1377 of 2013

### 3. Who we are

The companies CELUMANÍA ENTRETENIMIENTO CELULAR SAS, ESTRATEGIAS MÓVILES SAS, AXESNET SAS, and ALDEA MÓVIL SAS are companies domiciled in Colombia, responsible for the processing of personal data. Our contact details are:

Email: [usodedatos@aldeamo.com](mailto:usodedatos@aldeamo.com)

Address: Carrera 17A No 106 - 30

Telephone: 2148165

[www.aldeamo.com](http://www.aldeamo.com)

*This translation has been done by JOSE F. JARAMILLO SANINT, official translator and Interpreter for the English-Spanish-English languages according to resolution No. 0499 Issued on April 02, 2004 by the Ministry of the Interior and Justice, Republic of Colombia.  
This document is an accurate translation of the original. July 30, 2020*







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1

#### 4. Databases

In order to provide our services and the operations, administration and management of our companies, we have the following databases, which are governed by the conditions established in this policy and in the applicable regulations:

1. In our corporate business unit, we have databases related to our corporate clients and their employees.
2. In our entertainment business unit, we have databases of customers and users. Likewise, we have databases of our employees and suppliers.

#### 5. Information and personal data we collect

At ALDEAMO we provide different services to our clients and users and for this we require personal information.

In our corporate client's business unit, we collect the following data from employees of these companies, among which are:

Name, company where he/she works, work address, cell phone, gender, age, email, landline telephone number and the RUT.

On the other hand, in our entertainment business unit we collect the following personal data: cell phone number, balance and consumption of his/her SIM card. Likewise, we may collect data such as name, surname, landline, email, gender, age, geographic location (city but not necessarily the address).

In relation to the supplier database, we collect the following information: Name, company where he/she works, work address, cell phone, gender, age, date of birth, email, landline telephone number, RUT, citizenship card and number of bank accounts.

From our employees we can collect the following information:

1. (i) Name and surname
2. (ii) Citizenship card
3. (iii) Email
4. (iv) Date of birth
5. (v) Level of study and academic
6. (vi) Marital status

2

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7. (vii) Basic salary
8. (viii) Date of entry to the company
9. (ix) Position within the company
10. (x) Contact phone and emergency phone
11. (xi) Home address
12. (xii) EPS, AFP, ARP, Severance Administrator
13. (xiii) Blood group and RH
14. (xiv) Size of clothing and footwear
15. (xv) Photography
16. (xvi) Bank account number
17. (xvii) Information about family group members
18. (xviii) Information on personal references

In some cases, sensitive data may be collected. The owners are informed that they will not be obliged in any event to authorize the treatment of sensitive data, and therefore the provision of our services is not conditioned on the delivery of this sensitive information.

All ALDEAMO databases and information are stored in Colombia, Norway and the USA, where we have servers and providers with whom we sign technical and storage service contracts. Besides, this collected information can be remotely consulted by ALDEAMO employees from Oslo, Barcelona and Quito, and people from our engineering team who are in Peru, Guatemala and Ecuador, in order to use it for analysis, services and internal statistics.

The information provided will remain stored for the maximum term necessary to allow us to comply with the legal and/or contractual obligations in our charge, especially in accounting, contractual, fiscal and tax matters or to comply with the provisions applicable to administrative, accounting, fiscal, legal and historical information.

We presume the veracity of the information provided and we do not verify, nor do we assume the obligation to verify the veracity, validity, sufficiency and authenticity of the data that is provided to us. Therefore, we do not assume responsibility for damages of any nature that may have originated in the lack of truthfulness, validity, sufficiency or authenticity of the information, including damages that may be due to homonymy or identity theft. If you provide us with personal information about a person other than yourself, such as your spouse or a co-worker, we understand that you have the authorization of that person to supply us with your data.

By signing up for our services, signing up via text messages (SMS or MMS), giving us your personal data through the different customer service channels and/or browsing our website, our customers, users and/or visitors to the page expressly state that they know these policies, accept them, and give their consent for their information to be processed.







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## 6. Purposes of the treatment

If you provide us with personal data, you authorize us to use this information for the purposes indicated in accordance with the provisions of this Policy, and we will not proceed to transfer or disclose it outside of our databases unless (i) you authorize us to do so, (ii) it is necessary to allow our contractors, suppliers or agents to provide the services we have entrusted to them, (iii) it is used by us or third parties (for example, telecommunications service providers) to provide our products or services to you, (iv) is delivered to entities that provide marketing services on our behalf or to other entities with which we have joint marketing agreements, (v) is related to a merger, consolidation, acquisition, divestment or other restructuring process, (vi) implement a contract for the transmission of personal data under the terms of Decree 1377 of 2013, or (vii) as required or permitted by law or for the purposes developed in this policy.

By accepting this Policy, the holders of the personal data collected, authorize us to carry out their treatment, partially or totally, including the collection, storage, recording, use, circulation, processing, deletion, transmission and/or transfer to third countries of the data provided, for the execution of activities related to the services we provide, such as, processing, confirming, fulfilling and providing the services and/or products purchased, directly and/or with the participation of third-party providers of products or services, as well as to promote and advertise our activities, products and services, profile our clients, learn more about the users of our services and be able to develop new services, carry out transactions, make reports to the various authorities of national or international control and surveillance, attend to requests from police authorities or judicial authorities, banking entities and/or insurance companies, for internal and/or commercial administrative purposes such as, market research, audits, accounting reports, statistical analyzes, reimbursements, attention to queries, complaints and claims, billing of services, payment of compensation and indemnities, accounting records, correspondence, contact with our suppliers to purchase products or services and pay them, among others. Likewise, the information of our employees that rest in our databases is used exclusively for the purpose of complying with labor contracts and other obligations derived from contracts or applicable laws (filing them with the social security system, paying wages and other provisions, social and family benefits, etc.). In our corporate business unit specifically, personal data is collected for the submission of proposals to clients, monitoring and permanent commercial contact.

Additionally, customers and users, employees and suppliers, in their capacity as holders of the collected data, by accepting this policy, authorize us to:

- Use the information received for marketing purposes of our products and services, and of the products and services of third parties with whom we have a business relationship.
- Share personal data with telecommunications service providers in order to provide services.







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- Supply personal data to the police and judicial control and surveillance authorities, pursuant to a legal or regulatory requirement and/or use or disclose this information and personal data in defense of our rights and/or assets as soon said defense is related to the products and/or services contracted by its clients and users, or in our labor or commercial relationship with our employees and suppliers.
- Allow access to information and personal data to auditors or third parties hired to carry out internal or external audit processes typical of the commercial activity we carry out.
- Consult and update personal data, at any time, in order to keep this information updated.
- Contract with third parties the storage and/or processing of the information and personal data for the correct execution of the contracts concluded with us, under the security and confidentiality standards to which we are obliged.
- Transfer and transmit personal data to countries other than those where the information is collected, for which we will endeavor to protect such data in accordance with the security and confidentiality standards established in this document.
- Receive electronic communications with advertising and commercial news from ALDEAMO and the products or services that we commercialize or promote.

Minor children and adolescents may be users of the products and services that we offer, as long as they act through or duly authorized by their parents or by those who have parental authority over the minor. We will ensure the proper use of the personal data of children and adolescents under age, guaranteeing that in the treatment of their data their best interests are respected, and their fundamental rights and, where possible, taking into account their opinion, as holders of their personal data.

With the acceptance of this Policy, the holders of personal data authorize us to send them by different means and channels (including email, SMS or text messages, etc.) information on products and services, and offers of Products and services that we believe may be of interest to you.

Our website uses advertising servers in order to provide advertising content that you see on our pages. These advertising servers use cookies that allow you to adapt the advertising content to the demographic profiles of the personal data holders and know the origin, activities and preferences of our clients and users when browsing the web, increase the functionality and accessibility of the websites, verify that the users meet the criteria required to process their requests and to adapt their products and services to the needs of users. These cookies can be disabled and removed as desired. For this purpose, you can consult and/or request the help of the Internet browser you use.





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## 7. Security and confidentiality

The data supplied and stored in our databases are also protected by security systems that prevent unauthorized third parties from accessing them. ALDEAMO makes its best efforts to have the most up-to-date procedures for the effectiveness of security systems. In this sense, we rely on technological security tools and implement security practices recognized in the industry, which include: transmission and storage of sensitive information through secure mechanisms, such as encryption, use of secure protocols; assurance of technological components, restriction of access to information only to authorized personnel, backup of information, safe software development practices, among others.

We have established information security policies, procedures and standards, whose objective is to protect and preserve the integrity, confidentiality and availability of information, regardless of the medium or format where it is located, its temporary or permanent location or the way in which it is transmitted.

The third parties hired by us are also obliged to adhere to and comply with the information security policies and manuals, as well as the security protocols that we apply to all our processes.

Any contract with third parties (contractors, employees, external consultants, temporary collaborators, etc.) that involves the treatment of information and personal data, includes a confidentiality agreement that details its commitments for the protection, care, security and preservation of confidentiality, integrity and privacy of the same.

## 8. User rights and procedures

With the acceptance of this Policy, you freely, expressly and previously have been informed about the rights that the law grants you as the owner of your personal data and that are set forth below:

- (i) Know, update and rectify your personal data in front of the entity responsible for the treatment or in charge of the treatment of your personal data.
- (ii) Request proof of the authorization granted to the data controller except when expressly excepted as a requirement for treatment.
- (iii) Be informed by the person responsible for the treatment or the person in charge of the treatment, upon request, regarding the use that has been made of the personal data.
- (iv) Present complaints to the Superintendence of Industry and Commerce for violations of the personal data protection regime.
- (v) Revoke the authorization and/or request the deletion of personal data in the terms of Law 1581 of 2012.
- (vi) Access free of charge once a month to your personal data that has been processed, in accordance with current regulations.







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The procedures for exercising your rights will be as follows:

**(i) Queries**

Holders, authorized persons or successors may consult their personal information that resides in our databases, in which case we will provide them with the requested information, after verification of the legitimacy to present said request. The consultation will be attended within a maximum term of ten (10) business days from the date of receipt. When it is not possible to attend the consultation within said term, you will be informed of the reasons for the delay, indicating the date on which your consultation will be attended, which in no case may exceed five (5) business days after the expiration of the first term.

**(ii) Claims**

If the holders, authorized persons or successors consider that the information contained in a database must be subject to correction, updating or deletion, or when they notice the alleged non-compliance with any of the duties contained in the Regulation, they may submit a claim before us, which will be processed under the following rules:

1. Your claim must be made by request addressed to ALDEAMO, with your identification, the description of the facts that give rise to the claim, your address, and accompanying the documents that you want to assert. If the claim is incomplete, we will require it within five (5) days after receipt of the claim to correct the failures. After two (2) months from the date of the request, without you submitting the required information, we will understand that you have withdrawn the claim.

In the event that we are not competent to resolve your claim, it will be transferred to the appropriate person within a maximum period of two (2) business days and will inform you in a timely manner.

2. If applicable, once the complete claim has been received, a legend will be included in the database that says "claim pending" and the reason for it, within a term not exceeding two (2) business days. It should be kept until the claim is decided.

3. The maximum term to attend the claim will be fifteen (15) business days counted from the day following the date of its receipt. When it is not possible to attend the claim within said term, you will be informed of the reasons for the delay and the date on which your claim will be addressed, which in no case may exceed eight (8) business days after the expiration of the first term.

Holders of personal data can exercise their rights to know, update, rectify and delete their personal data by sending their request to the email [usodedatos@aldeamo.com](mailto:usodedatos@aldeamo.com) or by writing to Carrera 17A No 106 - 30, Bogotá- Colombia in accordance with this Policy.

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The area of attention to requests, consultations or claims before which the owner of the information can exercise their rights is:

Contact address: [usodedatos@aldeamo.com](mailto:usodedatos@aldeamo.com)

Area: Customer Service

Telephone: 2148165

Contact address: [usodedatos@aldeamo.com](mailto:usodedatos@aldeamo.com)

### 9. Modifications and validity of the information and personal data treatment policy

ALDEAMO reserves the right to modify these Information and Personal Data Treatment Policies, in whole or in part. In the event of substantial changes in the Treatment policies referring to the identification of ALDEAMO and the purpose of the Treatment of personal data, which may affect the content of the authorization, ALDEAMO will communicate these changes to the owner at the latest when implementing the new policies.

Modifications may be made at any time regarding the terms and conditions of this policy, and/or the practices of sending e-mails. If we decide to introduce any material change to our policies, it will be reported on the website and publishing an updated version of the Personal Data Processing Policies. The databases will be valid indefinitely, in accordance with the purposes and uses of the information.

This policy was modified and published on our website on November 17, 2014 and is effective as of the publication date.

