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		<b>Process:</b> Quality
		<b>Code:</b> CM-PO-001
		<b>Version:</b> 01
<b>Approved: Manager</b>		<b>Date approved:</b> August 2022

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## Introduction

Article 13 of Decree 1377 of 2013 sets forth that the Data Controllers are obligated to both adopt a Data Processing Policy for the processing of personal data or personal data and ensure its effective compliance.

INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A., TIN 901.270.863-5, Carrera 47 A No 96 -21, office 303, Bogota, email [admon@inphaprogroup.com](mailto:admon@inphaprogroup.com) and telephone 7037090, as a Data Controller is committed to the strictest compliance with law and protection of individuals informs the Data Subjects, customers, suppliers, and collaborators that have adopted the following policies on the collection, processing, and use of personal data, which will be mandatory for the Company as Data Controller, its employees, and any third party that on behalf of the company acts as Data Processor or have access to the data.

## Scope

These policies will apply to the processing, collection, storage, use, circulation or final disposal of the personal data of the following Data Subjects:

- a) Customers and suppliers who have or have had business relationships with the company;
- b) Current workers of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. or who have had at some time an employment relationship with the company, as well as their relatives and beneficiaries, or those who are linked as apprentices;
- c) Candidates and participants in selection processes;
- d) Visitors at the company's headquarters;
- e) Users or citizens in general who contact the company.


## Definitions

**Consent:** Prior and express consent granted by the Data Subject for the processing of the data.

**Personal data:** Information linked or that can be associated with one or more determined or determinable natural persons and which can identify it, e.g. name, address, phone number, email, marital status, etc.

**Semi-private personal data:** Those data that do not have an intimate, reserved, or public nature and whose knowledge or disclosure may interest not only its Data Subject but a group of people or society in general. In this case, their processing requires the express consent of the Data Subject, e.g., financial data, data relating to relations with social security entities (EPS, AFP, ARL, Compensation Funds).

**Sensitive personal data:** Information that affects the privacy of the Data Subject so an improper use can generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions, social organizations, human rights, or that promotes interests of any political party or that guarantee the rights and guarantees of opposition political parties as well as the information relating to health, sex life, and biometric data. These data cannot be processed

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unless it is required to safeguard a vital interest of the Data Subject, or he/she is helpless, and data obtaining has been expressly authorized.

**Private personal data:** Personal data that only interest the Data Subject for its intimate or reserved nature and processing requires express consent, e.g., level of education, books of merchants, among others.

**Public personal data:** Type of personal data that the regulations and the Constitution have expressly determined as public, and, consent of the Data Subject is not necessary for collection and processing, e.g., marital status of people, RUNT data, enforceable judicial judgment data, among others.

**Data Processor:** Natural or legal person, public or private, that either by alone or in association with others, carries out the Processing of personal data on behalf of the Data Controller.

**Data controller:** A natural person or public/private legal person who makes decisions about the database and/or data processing alone or in association with others.

**Data Subject:** A natural person who owns the data and who must authorize the processing. If Data Subject is underage, their legal representatives will have the power to consent to the personal data processing.

**Processing:** Any operation or operation set on personal data, such as collection, storage, use, circulation, or deletion.

**Claim:** Request from the Data Subject or from the persons authorized by law to correct, update or delete personal data from the existing records held by the Data Controller and to revoke the consent in the cases established by law.

**Transfer:** The data transfer occurs when the Data Controller or Data Processor in Colombia sends information or data to a recipient that can be found inside and outside the country.


**Transmission:** Processing personal data with communication of data inside or outside the Republic of Colombia territory to carry out the processing by a Data Processor who would act on behalf of the Data Controller.

### **Principles applicable to the processing of Personal Data**

For the processing of personal data, INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. will apply the guiding principles provided by law for the data processing, which are described below:

**Lawfulness:** The processing of personal data will be carried out under Act 1581 of 2012 and its regulatory decrees.

**Purpose:** The personal data collected must be used for a specific and explicit purpose which must be informed to the Data Subject or permitted by Law. The Data Subject must be previously notified about the purpose of the data provided in a clear and complete manner.

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**Freedom:** The Personal Data collection may only be conducted with prior, express, and informed consent by the Data Subject.

**Veracity or Quality:** The information subject to the Processing of Personal Data must be truthful, complete, accurate, updated, verifiable and understandable.

**Transparency:** The processing of personal data may only be carried out by persons authorized by the Data Subject and/or by the persons provided for in the Law.

**Access and restricted circulation:** The processing of personal data must be carried out under applicable legal provisions (Statutory Law 1581 of 2012 and its regulatory decrees).

**Security:** The Personal Data of every Data Subject must be processed under security measures necessary to avoid their loss, adulteration, unauthorized or fraudulent query, use, or access.


**Confidentiality:** All employees of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. are obliged to keep personal data confidential, even after the end of their employment or contractual relationship.

## Personal data processing and purpose

### Contractors, suppliers or third parties

The personal data of customers and suppliers of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S., either natural or legal persons, will be collected, stored, used, transmitted and transferred, or in general, processed for the following purpose:

- a) Verify the suitability and competence of the supplier or contractor, and/or its workers;
- b) Develop the supplier evaluation and selection process, as well as study of network sufficiency;
- c) Check disciplinary, tax and/or criminal records, as well as the inclusion of the supplier in risk lists or restrictive lists;
- d) Formalize and comply with the required documentation during the enrolment and registration processes of suppliers or contractors;
- e) Allow creating business relationships linking suppliers or contractors with INPHAPRO S.A.S., which may require the processing of sensitive data in the subscription or recognition of documents in which fingerprint is provided;
- f) Allow the execution of the contracting purpose;
- g) Maintenance or reporting of accounting records as required by law, and complying with requirements of control entities;
- h) Issue certificates, and provide references to those who request them;
- i) Make queries in the event of requiring clarifications, guarantees, or audits;
- j) Evaluate the quality of services under the levels of service received from suppliers;
- k) Sensitive data such as fingerprint will be processed in order to support consent in contractual matters;
- l) Maintain an efficient communication of information that is useful in the contractual links between the organization and its suppliers and contractors;
- m) Fulfill the obligations of the organization set forth by law or required by competent authorities;
- n) Payment record, control, and processing on information systems of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S.;

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- o) Update of data and identity documents;
- p) Any other purpose included in the respective consent or privacy notice.

The information collected from suppliers and contractors will correspond mainly to identity data and location data related to the performance of a profession or a trade to allow the acquisition of products by INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. Such personal data will be kept for as long as the business or contractual relationship between INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. and the supplier or contractor plus five (5) years and the additional time as required by legal or contractual circumstances.

### Employees

The personal data of the collaborators of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. will be collected, stored, used, transmitted and transferred, or in general, processed for the following purpose:

- a) Comply with obligations as an employer as set forth by Colombian labor law and as required by the competent authorities;
- b) Manage payroll and social security payments, which may include records on banking portals;
- c) Provide adequate work cloth provision to the worker;
- d) Execute and evidence participation of workers in trainings, activities, workshops, and education plan;
- e) Conduct disciplinary proceedings;
- f) Implement the Management System of Occupational Health and Safety (MS-OHS);
- g) Create and administrate users to access to the organization's platforms (software) and emails.
- h) Maintain efficient communication through e-mail, telephone, text messaging (SMS and/or MMS), instant messaging or any other means of communication;
- i) Record on accounting books as required by law;
- j) Generate records on the information systems of the organization;
- k) Meet requirements of control entities;
- l) Contact family members in the event of an emergency;
- m) Conduct data update campaigns;
- n) Conduct processes of qualification of origin and percentage of labor capacity loss of workers;
- o) Submit applications and pension paperwork;
- p) Issue employment certificates and provide work references;
- q) Sensitive personal data, such as images captured by security cameras, will be processed to control the organization's facilities, ensure their security and promote healthy work environments;
- r) Sensitive personal data, such as images captured in photographs, will be processed to generate a company card to the personnel, keep support for recreational or cultural and wellness activities, as well as internal corporate publications, website and/or social networks of the company, and include them in graphic and/or advertising pieces;
- s) Sensitive personal data, such as the voice and image captured in teleconferences or virtual meetings, will be processed to record the realization of calls, conferences, workshops, or events and allow their subsequent query;
- t) Sensitive data such as monitoring health symptoms will be collected for the sole purpose of complying with the biosecurity protocols required by health emergencies and pandemics;

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- u) The others contained in the respective consent or privacy notice.

In the case of workers, the personal data of the MS-OHS will be retained for a term of twenty (20) years from the end of the employment relationship as required by Resolution 312 of 2019, and the information of the labor history related to parafiscal contributions and social security payments for a term of eighty (80) years, under legal or contractual circumstances that require to keep that information.

### **Retired Employees**

The information of the former workers is processed to provide information on the contractual relationship that existed between INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. and the worker or collaborator, particularly for:

- a. Issue employment certificates and labor references to those who request them;
- b. Respond to requests for querying by their Data Subjects, successors, or those authorized by the Law to make queries;
- c. Comply with the obligations imposed by Colombian labor law.

### **Family members and beneficiaries of employees**

The information of the relatives and beneficiaries of the workers will be processed in order to fulfill the obligations of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S., and particularly for:


- a. Comply with the obligations as an employer under Colombian labor law issued by the competent authorities;
- b. Affiliate and manage affiliations of beneficiaries of workers to social security, and compensation funds;
- c. Carry out and maintain supporting documents of well-being, recreational or cultural activities, and the different activities developed in the employment relationship.

Family members and beneficiaries' personal of workers will be retained for the same term that the worker's personal data by the Data Processor of the organization, also considering the legal or contractual circumstances that may make it necessary to process them for an additional term.

### **Candidates and participants in selection processes**

The information of the applicants will be processed to select personnel for the organization and finally specify an employment relationship between INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. and the applicant and particularly for:

- a. Allow the development of the selection processes of the organization;
- b. Verify the veracity of the information provided;
- c. Carry out rectification of personal and/or work references and home visit;
- d. Participate in psychotechnical, psychophysical, and/or polygraph interviews;
- e. Query disciplinary and/or judicial records or those related to restrictive risk lists, prevention of money laundering, corruption and/or terrorist financing;

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f. Perform medical entrance exams.

In the case of applicants, personal data will be retained for a term of twelve (12) months from the time the applicant has completed his participation in the selection process to which he/she applied, also considering the legal or contractual circumstances that could make the processing necessary for an additional term.

### Visitors

Personal data of visitors will be processed to administer and control visitor entry into and exit from the company facilities, particularly to:

- a. Promote the safety of monitored spaces;
- b. Allow entry only to people who have consent for entry into by the person they visit;
- c. Share data with third parties if an emergency occurs;
- d. Share data with third parties if any competent authority requires them for police investigations or security reasons.
- e. Any reason contained in the respective consent or privacy notice.

Visitors' data will be retained for thirty (30) days from its collection, plus the additional time as required for legal or contractual circumstances.

### Customers

Personal data of customers who contact INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. will be processed to respond to any query, claim, or complaint presented, particularly to:

- a. Record communications received;
- b. Manage client queries (portfolio, data updating and document and filing management).


Personal data of customers will be retained by INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. from their collection plus the additional time as required by legal or contractual circumstances.

## National and International Transfer and Transmission of Personal Data

### National Transfer and Transmission

INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. may circulate personal data with third parties external to the organization located in the national territory, whether these governmental or other public authorities (including, but not limited to judicial or administrative authorities, tax authorities, and criminal, civil, administrative, disciplinary and tax investigation bodies), third parties participating in legal proceedings, accountants, auditors, lawyers and other advisors and representatives, whose function is necessary to (a) comply with applicable laws; (b) dealing with legal proceedings; (c) respond to requests from public authorities and Government; (d) receive professional or specialized advice; (e) Protect the operations of the organization.

INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. will take the necessary measures so that

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the third parties in charge of the organization know and undertake to observe this Policy, under the understanding that the personal data they receive may only be used for matters directly related to the corporate purpose of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. and with the purpose for which they were collected and may not be used or intended for a different purpose.

### International Transfer and Transmission

On the other hand, INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. carries out international transmission of data on the occasion of the delegation to third parties of the data storage service on servers external to the company located outside the country. In such cases, INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. will ensure that the country to which the data are transmitted provides adequate levels of data protection, which in no case may be lower than those established in Colombia by Statutory Law 1581 of 2012; and will take the necessary measures so that the third parties acting as Data Processors, can only use the information provided for the purpose for which they were collected, and cannot be used or intended for a different purpose. Likewise, in the international transmission of data, an agreement under the terms of article 25 of Decree 1377 of 2013 will be executed or otherwise inform the respective Data Subjects to obtain their consent.

### Data Subject Rights

The rights that Data Subjects, suppliers, customers, and collaborators of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. regarding the processing of their personal data are:

**Update and access:** Know, update, and rectify your personal data. This right may be exercised regarding partial, inaccurate, incomplete, fractional, error-inducing data, or those whose processing is expressly prohibited or has not been authorized.

**Proof:** Request proof of the consent granted to the Data Controller.

**Knowledge:** Be informed by INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. of the use that has been given to your personal data.

**Complaint:** Submit to the Superintendence of Industry and Commerce complaints for violations of the Data Protection Act and other regulations as amended, superseded.


**Withdrawal:** Withdraw the consent and/or request the deletion of data where the Data Subject considered that principles, rights, and constitutional and legal guarantees are not respected during the processing. The revocation and/or suppression will proceed when the Superintendence of Industry and Commerce has determined that Data Controller or Data Processor has incurred behaviors contrary to the law and the Constitution during the processing.

**Rectification:** Request for rectification of information and Personal Data under the control of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S.

**Request:** Access free of charge to your personal data that have been processed.

The Data Subjects may exercise their legal rights and request for any procedures established in this Policy by contacting the company at email [admon@inphapro.com](mailto:admon@inphapro.com). INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S will be responsible for responding to complaints, queries, or claims under provisions of Colombian regulations on Personal Data protection and within the times established therein.



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### Sources of information and update of data:

INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. will obtain personal data directly from Data Subjects through different sources of information, data update forms, and other updating tools deployed by the company to ensure an updated, consistent, and reliable personal data database for achieving the purposes of this policy.


### Duties of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S.

When INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. is the direct Data Controller shall comply with the following duties:

- a. Ensure full and effective exercise of the constitutional right of habeas data to the Data Subject at all times;
- b. Request and keep, under the conditions outlined in this manual, a copy of the consent granted by the Data Subject;
- c. Clearly inform the Data Subject about the data collection purpose and his/her rights as a result of the consent granted;
- d. Keep the data under the security conditions required to prevent their loss, adulteration, unauthorized or fraudulent query, use, or access;
- e. Ensure that the information provided to the Data Processor is true, complete, accurate, updated, verifiable and understandable;
- f. Update data, communicate promptly to the Data Processor all the news regarding data that has previously been provided, and adopt necessary measures so that the information is kept updated;
- g. Rectify the information when it is incorrect and communicate the pertinent to the Data Processor;
- h. Provide the Data Processor only data whose processing is previously authorized;
- i. Demand from Data Processor respect the conditions of security and privacy of the user's information;
- j. Process the queries and claims made by the Data Subjects within the times established in this Policy;
- k. Inform the Data Processor when certain information is under discussion by the Data Subject, once the claim has been filed and the respective procedure has not been completed;
- l. Inform at the request of the Data Subjects about the use given to their data;
- m. Inform the data protection authority when there are violations of security codes, and there are risks in the management of information of Data Subjects;
- n. Comply with the instructions and requirements from the Superintendence of Industry and Commerce.

When INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. acts as Data Processor, it will fulfill the following duties:

1. Ensure full and effective exercise of the constitutional right of habeas data to the Data Subject at all times;
2. Keep the data under the security conditions required to prevent their loss, adulteration, unauthorized or fraudulent query, use, or access;
3. Timely update, rectify or delete the data within the times established in this Policy;
4. Update the information reported by Data Controllers within five (5) business days from receipt;
5. Process the queries and claims made by the Data Subjects within the times established in this Policy;
6. Record on the database "claim in process" legend as regulated in this Policy;

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7. Insert in the database the "information under judicial discussion" legend once notified by the competent authority about judicial processes related to the quality of personal data;
8. Refrain from circulating information that is being disputed by the Data Subject and whose blocking has been ordered by the Superintendence of Industry and Commerce;
9. Allow access to information only to persons authorized;
10. Inform the Superintendence of Industry and Commerce when there are violations of security codes, and there are risks in the management of information of Data Subjects;
11. Comply with the data processing instructions and requirements issued by the Superintendence of Industry and Commerce.

### **Cases where consent is not required for data processing**

- a. Where data are public personal data;
- b. Where personal data is required by a public entity for matters under its jurisdiction;
- c. In the event of medical or health emergencies;
- d. Where they are processed for historical, statistical or scientific purposes;
- e. Where the data is related to information contained in the civil registry.

### **Persons to whom consent to data processing may be provided**

Information that meets the conditions set out in this policy may be provided to the following persons:


- a. Data Subjects, their successors in title or their legal representatives;
- b. Public or administrative entities in the exercise of their legal functions or by court order;
- c. Third parties authorized by the Data Subject or by law.

### **Policies for the processing of sensitive data**

Processing of sensitive data of Data Subjects is prohibited, except in the following cases:

- a. Where the Data Subject has given explicit consent to such processing, except in cases where the granting of such consent is not required by law;
- b. Where the data processing is necessary to safeguard the vital interest of the user and if it is physically or legally incapacitated. In these events, the legal representatives must grant their consent;
- c. Where the processing is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other non-profit organization, whose purpose is political, philosophical, religious or trade union, provided that they refer exclusively to its members or to persons who maintain regular contacts by reason of their purpose. In these events, the data may not be provided to third parties without the consent of the Data Subject;
- d. Where the processing refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process;
- e. Where the processing has a historical, statistical or scientific purpose. In this event, measures must be adopted to suppress the identity of the Data Subjects.

Data Subject shall be warned of the following conditions: a) they are not obliged to authorize the processing of their sensitive data and b) in addition to the general requirements of the consent for the

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collection of any type of personal data, it must be explicitly and previously established which data to be processed are sensitive, the purpose of the collection, and the obtaining of the express consent.

### **Procedure for exercising the rights by the Data Subjects**

The Data Subjects of INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. may submit queries and claims related to their personal data through the following means provided by the company, which will be in charge of the Purchasing department: Email [admon@inphapro.com](mailto:admon@inphapro.com), Web Portal [www.inphaprogrouphas.com](http://www.inphaprogrouphas.com), Bogota Hotline 7037090.

The query/claim raised by a Data Subject must, in all cases, contain at least the following information:

- a. Full identification (name, notification address, identity document);
- b. Description of the facts that give rise to the query/claim;
- c. The documents that prove the identity of the applicant and, if so, that of his representative with the respective consent;
- d. Documents supporting the facts;
- e. How Data Subject want to receive the answer to his/her query/claim.


In case of a query, the Data Subject will receive an answer within ten (10) business days following the filing of the query. Where it is not possible to attend within the previous term, Data Subject will be informed expressing the reasons for the delay and indicating the date on which the query will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

In case of a claim, a response will be given within fifteen (15) business days from the day following the filing date. When it is not possible to respond the claim within that term, reasons for the delay and the date on which your claim will be attended will be informed, which in no case may exceed eight (8) business days following the expiration of the first term.

If INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. is not competent to resolve it, it will notify the competent person within a maximum period of two (2) business days and inform the Data Subject of the situation. In the event that the request or claim related to the processing, privacy and protection of Personal Data is related to several databases, the Data Subject must submit the request or claim to the department in charge of Personal Data.

### **Information security assurance policy**

Under this Policy adopted by INTERNATIONAL PHARMACEUTICAL PRODUCTS S.A.S. for the personal data processing of our Data Subjects, we inform Data Subjects that the mechanisms through which they are used are secure and confidential since the company has the appropriate technical means to ensure that said data are stored securely ensuring their confidentiality.

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### **Effective Date**

This Policy will be effective from August 12, 2022. The Personal Data stored, used, or transmitted shall remain on the INPHAPRO database for as long as necessary to fulfill the purposes for which they were collected as required in this Policy. Thus, the validity of the database is closely related to the purposes for which the Personal Data was collected. This Policy also applies to Personal Data that was collected before the publication of this Policy.

### **Amendments**

This Policy may be amended from time to time by INPHAPRO and, where relevant, will be part of any contract/agreement entered into by INPHAPRO. Any substantial amendment of this Policy will have to be previously communicated to the Data Subjects through efficient mechanisms, such as the INPHAPRO website and/or emails. Consent from Data Subjects will also be sought if required by applicable law. Substantial amendments include but are not limited to modifications to the exercise of rights by the Data Subjects and the purposes of Personal Data processing where this may affect the consent.

Juan Alejandro Vargas Zapata  
Legal Representative