

MBC IT TALENT SOLUTIONS S.A.S. PERSONAL DATA PROCESSING POLICY

PURPOSE

To indicate the guidelines for the processing of personal data of natural persons in Mbc IT Talent Solutions S.A.S. in compliance with Law 1581 of 2012, *"By which general provisions for the protection of personal data are issued"* and its regulatory decrees.

SCOPE

Applicable to all interested parties of Mbc IT Talent Solutions S.A.S. company identified with NIT 901478787-8, located at Carrera 8 #42-63 Ca 421 of Manizales, Caldas and with telephone +57 3005989444, issues the following Personal Data Processing Policy.

This Policy contains the elements required by current regulations in developing the principles of legality, purpose, freedom, truthfulness or quality, transparency, access and restricted circulation, security, and confidentiality, provided for in Article 4 of Law 1581 of 2012.

In this way, Mbc IT Talent Solutions S.A.S. aims to guarantee and protect the fundamental rights to personal and family privacy and to a good name, the right to know, update, and rectify the information that has been collected about the people of the community in databases and archives and the right to information of the owners.

DEFINITIONS

Authorization: Prior, express, and informed consent of the holder to carry out the processing of personal data, which are obtained at the time of data collection.

Privacy notice: Verbal or written communication generated by the Data Controller, addressed to the holder, for the processing of their personal data, which informs them about the existence of the Information Processing Policy that will apply to them, the way

to access it and the purposes of the processing that is intended to be given to the personal data.

Data Controller: a natural or legal person, public or private, who, by themselves or in association with others, decides on the database and/or the processing of the data contained therein.

Holder: a natural person whose personal data is subject to treatment.

Treatment: any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.

Meeteam: Document management tool through which the information sent by the owners is collected and processed, thus forming databases to comply with the mission of Mbc IT Talent Solutions S.A.S.

DATA CONTROLLER

Mbc IT Talent Solutions S.A.S is responsible for processing non-public personal data, which it decides directly and autonomously.

- Location: Manizales, Caldas
- Address: Carrera 8 #42-62 Ca 421
- Website: <https://meeteam.co>
- WhatsApp: +57 3005989444
- Email: contact@meeteam.co

OBLIGATIONS

This policy requires mandatory and strict compliance for Mbc IT Talent Solutions S.A.S.; it will also strictly comply with the duties contained in Article 17 of Law 1581 of 2012 and the existing regulatory decrees in Colombian legislation.

DATA PROCESSING

The personal information of Users and third parties in general of Services must be collected, stored, used, circulated, shared, processed, and/or given any other type of Processing. This collection is through platforms such as LinkedIn, WhatsApp, Instagram, Facebook, email, and our website (meeteam.co), among others, for the following purposes:

PURPOSES

- a. For the execution of the corporate purpose of Mbc IT Talent Solutions S.A.S. and activities related to it, such as the development of its business lines concerning the Personal Data collected through the different channels.
- b. Establishing and complying with its own obligations arising from commercial or legal relationships established with our Users and Holders in general.
- c. Establishing and managing the pre-contractual, contractual, post-contractual, commercial, labor, civil, and any other relationship that arises between the parties.
- d. For the management of clients, training and education, management of internal statistics, provision of services in favor of clients of MBC IT Talent Solutions S.A.S., administrative procedures, registration of entry and exit of documents, publications, transmission of information to the holders, related to the purpose of the organization; data update and information of changes in the processing of personal data campaigns, legal and financial management and sending of communications.
- e. Guaranteeing compliance with any legal obligation and/or administrative or judicial requirement that may be presented and responding or acting in the framework of judicial proceedings when required.
- f. Carrying out controls and taking security measures to prevent fraud or corruption in the framework of commercial or legal relations.
- g. Managing the internal affairs of Mbc IT Talent Solutions S.A.S., including, but not limited to, accounting, financial and management reports, calculation, presentation and payment of taxes, other records and compliance reports, and internal or external audit processes. This information includes the Personal Data of directors and agents of the company's affiliates.
- h. h. Carrying out due diligence to verify information of Users, Customers, Suppliers – Contractors, Employees, and Holders in general, including compliance with laws relating to the prevention of money laundering and terrorist financing.

- i. For commercial purposes such as offering services and commercial campaigns, invitations to participate in benefit and loyalty programs.
- j. Consulting information centers for commercial and credit service purposes.
- k. Including the Personal Data in one or more databases will be managed by Mbc IT Talent Solutions S.A.S., the Authorized Entities, and/or a third party for the purposes set forth herein. Likewise, Mbc IT Talent Solutions S.A.S. databases may include and integrate data transmitted and/or transferred by Authorized Entities and/or third parties.
- l. Carrying out the Transfer and/or national and/or International Transmission of Personal Data, including to third countries that do not have an adequate level of protection in the terms established by the Superintendency of Industry and Commerce or the applicable regulations.
- m. Reporting substantial changes to this Policy.
- n. Responding to requests, queries, claims, and/or complaints made by the Holders of personal information through any channels enabled by Mbc IT Talent Solutions S.A.S. for this purpose.
- o. Contacting the Holders in relation to commercial, labor, civil, or any other issues in accordance with their contractual relationship with Mbc IT Talent Solutions S.A.S.
- p. Offering users, according to their profile, the possibility of a professional association in response to their requirements.
- q. Third parties who have access to certain data will, in turn, act as Data Controllers in accordance with this policy.

With the acceptance of this Policy, the Owner of the Personal Data expressly authorizes Mbc IT Talent Solutions S.A.S. to collect the data in the terms expressed in this Policy, as well as to consult, complement and update the Personal Data at any time with other Personal Data bases managed by third parties with Authorization or of a public nature, in order to keep the information updated.

With the Authorization through any of the mechanisms set forth in this document, the Data Holder authorizes Mbc IT Talent Solutions S.A.S. to process, obtain, compile, exchange, update, collect, process, store, reproduce, and/or dispose of their data or personal information, in part or in full, as well as to transfer and/or transmit such data or partial or total information to third countries, including those that do not have a level of protection higher or equal to Colombia, for the purposes stated above.

RIGHTS OF THE HOLDERS

As the holder of your personal data, you have the right to:

- a. Having free access to the data provided that has been processed.
- b. Knowing, updating, and rectifying your information against partial, inaccurate, incomplete, fractional, or misleading data or those whose processing is prohibited or has not been authorized.
- c. Requesting proof of the authorization granted.
- d. Filing complaints to the Superintendency of Industry and Commerce (SIC) of Colombia for violations of the provisions of current regulations.
- e. Revoking the authorization and/or requesting the deletion of the data, provided that there is no legal or contractual duty that prevents them from being deleted.
- f. Refraining from answering questions about sensitive data.
- g. Responses concerning sensitive data or data on children and adolescents will be optional.

RESPONSE TO REQUESTS, QUERIES AND CLAIMS

For inquiries and complaints regarding the Processing of Personal Data, they may be made through the following email: contact@meeteam.co

The maximum term provided by law to resolve your claim is fifteen (15) business days, counted from the day following the date of receipt.

When it is not possible to attend the claim within said term, the interested party will be informed of the reasons for the delay and the date on which their claim will be attended, which in no case may exceed eight (8) business days following the expiration of the first term.

VALIDITY

This Policy for the Processing of Personal Data applies as of April 16, 2021. The databases in which the personal data will be recorded will have a validity equal to the time in which the information is maintained and used for the purposes described in this policy. The personal data provided will be kept as long as it is not requested to be deleted by the interested party and provided that there is no legal duty to keep them.