

	POLICY FOR TREATMENT OF PERSONAL DATA	CODE: GC-PL-02
		VERSIÓN: 02
		ISSUE DATE: 16/10/2023

Moore Colombia is aware of the implications of the Treatment of Personal Data, so it performs said activity in conformity with the principles and guidelines contained in the Statute for Protection of Personal Data – Law 1581 of 2012, the decrees that regulate it and the guidelines for the implementation of the principle of proven liability of the Superintendency of Industry and Commerce – SIC.

Aimed at protecting and assuring to the owners of personal data a proper treatment of their information, MOORE COLOMBIA issues this Policy for Treatment of Personal Data in fulfillment of the relevant regulations and principles of legality, purpose, freedom, truth or quality, access and restricted circulation, security and confidentiality referred to by Statutory Law 1581 of 2012.

1. OBJECT

The Policy for Treatment of Personal Data of MOORE COLOMBIA seeks to guarantee the right of Habeas Data of the individuals who delivered their data to the company for the proper treatment (use, collection, suppression, storage and circulation) pursuant to the purpose informed in the authorization given.

2. IDENTIFICATION OF THE PERSON RESPONSIBLE FOR THE TREATMENT OF PERSONAL DATA

The identification of the responsible person is in the Manual for the treatment of personal data GC-MN-02. In addition it has designated within its structure a Personal Data Protection Officer according to the provision of the Guide for implementation of the Proven Liability principle of the Superintendency of Industry and Commerce. The Data Protection Officer assumes the function of protecting the personal data within the company, in fulfillment of the regulations that rule this subject, as well as the policies established for that purpose within MOORE COLOMBIA

3. SCOPE OF THE POLICY FOR TREATMENT OF INFORMATION

According to Law 1581 of 2012 as owner of the personal data is understood the “Natural Person whose personal data are subject to Treatment”. Because of the foregoing, MOORE COLOMBIA’s policy is focused on personal data obtained from natural persons.

The coverage of the policies extends to all employees, clients and suppliers of MOORE COLOMBIA, as well as the potential clients with whom the company maintains a communication.

 MOORE	POLICY FOR TREATMENT OF PERSONAL DATA	CODE: GC-PL-02
		VERSIÓN: 02
		ISSUE DATE: 16/10/2023

Within the company there is NO treatment (collection, storage, use, circulation or suppression) of sensitive data (understanding as sensitive data those that affect the intimacy of the Owner or the undue use of which may generate their discrimination such as: racial or ethnic origin, political orientation, religious convictions, among others) of the owners of the personal data.

4. PERSONAL DATA SUSCEPTIBLE OF TREATMENT AND PURPOSE OF THE DATA

MOORE COLOMBIA treats the personal data indicated in the Manual for the treatment of personal data, whereby the custody and confidentiality of the information is guaranteed.


5. RIGHTS OF OWNERS OF PERSONAL DATA

MOORE COLOMBIA informs to the owners of the treatment of personal data that the rights that they may exercise in accordance with Law 1581 of 2012, are the following:

- To access their personal data free of charge.
- To know, update and rectify their information in respect to partial, inaccurate, incomplete, fractioned data that will induce to error or those the treatment of which is prohibited or has not been authorized.
- To request evidence of the authorization granted, provided that it does not refer to those cases in which obtaining the Authorization of the Owner is excepted by the Law or those cases in which the collection of data occurred prior to June 27, 2013.
- To process the inquiries and complains following the guidelines established in the law and in this policy.
- To revoke the authorization and/or request the suppression of the data, provided that there is no legal or contractual duty that prevents their elimination.
- To refrain from answering questions on sensitive data.

6. PROCEDURE FOR THE EXERCISE OF THE RIGHT OF HABEAS DATA AND ATTENTION OF PETITIONS, INQUIRIES AND COMPLAINS

The Processes and Quality area is the unit that is in charge of processing the requests from the owners in order to enforce their rights to know, update, rectify and suppress information and revoke their authorization.

	POLICY FOR TREATMENT OF PERSONAL DATA	CODE: GC-PL-02
		VERSIÓN: 02
		ISSUE DATE: 16/10/2023

If you wish to make an inquiry, complaint or petition related to the protection of personal data, you may contact us at the following address: Carrera 7 No. 71-52, Of. 1502, Bogota (Colombia) Telephone +57 (601) 4924850, sending an email to habeasdata@moore-colombia.co or accessing Customer Service, Suppliers and Stakeholders at our web page <https://www.moore-colombia.co/>.

The procedures for inquiries, claims, petitions for update or rectification are defined in the Manual for treatment of personal data GC-MN-02.

7. TIME LIMITATIONS TO THE TREATMENT OF PERSONAL DATA

According to Decree 1377 of 2023, MOORE COLOMBIA can only collect, store, use or circulate a person's personal data during the time that it is reasonable and necessary, in accordance to the purposes that justified the treatment, following the provisions applicable to the relevant subject and the administrative, accounting, tax, legal and historic aspects of the information. Once the purpose or purposes of the treatment have been accomplished and notwithstanding the legal regulations that may provide otherwise, MOORE COLOMBIA shall proceed to the suppression of the personal data in its possession. As exception to the foregoing MOORE COLOMBIA may keep the personal data when so required for the compliance with a legal or contractual obligation.

8. EFFECTIVENESS OF THE POLICY FOR TREATMENT OF INFORMATION

This Policy for the Treatment of Personal Data becomes effective as of the date of its approval and disclosure.

9. CHANGE CONTROL

Version	Date	Description	Prepared	Reviewed	Approved
01	02-16-23	Initial Document	Risk Consultant	Operations Manager	Partner General Director
02	16-10-23	Phone and address change	Quality and risk management coordinator	Operations Manager	Partner General Operations Manager