

Privacy Policy

PERSONAL DATA PROCESSING POLICY MEGA STORAGE COLOMBIA S.A.S

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FIRST CHAPTER GENERAL PROVISIONS

1.1 Identification of the Data Controller

MEGA STORAGE COLOMBIA S.A.S, in order to comply with this policy, is identified below:

A. NIT AND COMPANY NAME: **MEGA STORAGE COLOMBIA S.A.S**

B. ADDRESS: **CALLE 8 B N 65 251**

C. PHONE: **605 15 25**

D. EMAIL: **datosmega@outlook.com**

1.2 Definitions

Definitions for understanding this policy:

1. **Authorization:** Prior, express, and informed consent of the Data Subject for the Processing of their personal data by a third party.
2. **Database:** Organized set of personal data that is the subject of Processing.
3. **Personal data:** Any information linked to or that can be associated with one or more specific or identifiable natural persons.
4. **Public data:** Data that is not semi-private, private, or sensitive.
5. **Sensitive data:** Sensitive data is defined as data that affects the privacy of the Data Subject or whose misuse may lead to discrimination.
6. **Semi-private data:** Semi-private data is data that is not of an intimate, reserved, or public nature and whose knowledge or disclosure may be of

interest not only to the Data Subject but also to a certain sector or group of people or to society in general.

7. **Private data:** Data that, due to its intimate or reserved nature, is only relevant to the Data Subject.
8. **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.
9. **Data Controller:** Natural or legal person, public or private, who, by itself or in association with others, decides on the database and/or the processing of the data.
10. **Data Subject:** Natural person whose personal data is subject to processing.
11. **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.
12. **Transfer:** Data transfer occurs when The Controller and/or Processor of personal data, located in Colombia, sends the information or personal data to a recipient, who is also the Controller and is located within or outside the country.
13. **Transmission:** Processing of personal data that involves communicating the data within or outside the territory of the Republic of Colombia when the purpose is to carry out processing by the Processor on behalf of the Controller.

1.3 Purpose and Scope of the Policy

The purpose of the Personal Data Processing Policy is to establish the criteria under which personal information stored in the databases, physical and digital files of **MEGA STORAGE COLOMBIA S.A.S.** is processed, the requirements for inquiries and complaints, as well as the purposes, security measures, and other aspects related to the protection of personal information.

1.4 Data Subjects to Whom This Policy Is Addressed

This Personal Data Processing Policy is addressed to:

1. Employees
2. Customers
3. Suppliers
4. Anyone who has a commercial and/or contractual relationship with **MEGA STORAGE COLOMBIA S.A.S.**

CHAPTER TWO PROCESSING OF PERSONAL DATA

2.1 Types of Personal Databases

MEGA STORAGE COLOMBIA S.A.S. has three types of databases, which are classified into three categories:

1. CUSTOMER DATABASES

This category contains data of individuals and legal entities that have a commercial relationship with **MEGA STORAGE COLOMBIA S.A.S.**

2. EMPLOYEE DATABASES

This category contains data and/or databases related to payroll management, occupational health and safety, and personnel administration in general.

3. SUPPLIER DATABASES

This category includes data and/or databases related to the management of suppliers and contractors.

2.2 Types of Personal Data Collected by MEGA STORAGE COLOMBIA S.A.S.

The data collected by **MÁS GLOBAL S.A.S** falls into the following data category:

TYPE OF PERSONAL DATA CONTAINED IN THE DATABASES
IDENTIFICATION DATA
General identification data of the person: Names, surname, type of identification, identification number, f
Specific identification data of the person: Signature, nationality, family data, electronic signature, other
LOCATION DATA
Location data related to the commercial or professional activity of individuals: address, telephone number, email address.
Personal location data related to the private activity of individuals: home address, telephone number, email address.
SENSITIVE DATA
Data related to the health of the individual: images, endoscopies, pathologies, studies, etc.
SOCIOECONOMIC DATA
Tax information data of the person
Asset data of the person: movable and immovable property, income, expenses, investments, etc.
Data related to the economic activity of the person
Data related to the person's employment history, work experience, position, dates of entry and retirement, notes
Data related to the person's educational level, training, and/or academic history

General data related to affiliation and contributions to the comprehensive social security system: EPS; IPS; ARL, dates of entry
OTHER DATA
Data on the person's criminal and/or disciplinary record
Personal data for access to information systems: users, IP, passwords, profiles, etc.

2.3 Processing to which the personal data is subjected

The personal data obtained is subject to the following processing:

2.3.1 Collection

The processing of personal information carried out by **MEGA STORAGE COLOMBIA S.A.S.** is obtained through various activities related to its corporate purpose and its obligations as an employer. The information is obtained directly from the data subject.

The instruments used by **MÁS GLOBAL S.A.S.** to collect information meet all the requirements established in the regulations regarding the protection of personal data. These instruments are:

Databases	
HUMAN RESOURCES	Resume
	Direct interview with the employee
	Public documents
CUSTOMERS	Company incorporation document
	Tax ID number
	Registration form
SUPPLIERS	Tax ID number
	Chamber of Commerce
	Purchase invoice

2.3.2 Storage

The personal information contained in the databases is stored on our own servers and is subject to all physical, technical, and administrative security measures, including access controls.

2.3.3 Uses and Purposes of Information Collection

The use and purpose of the information collected and stored in the databases has various objectives, including:

1. Sending information related to programs, activities, news, content by area of interest, products, and other goods or services offered by **MEGA STORAGE COLOMBIA S.A.S.**
2. Developing the corporate purpose of **MEGA STORAGE COLOMBIA S.A.S.** in accordance with its bylaws.
3. Complying with current Colombian regulations.
4. Complying with the regulations applicable to suppliers and contractors, including but not limited to tax and commercial regulations.
5. Comply with the provisions of Colombian law regarding labor and social security, among others, applicable to former employees, current employees, and prospective employees.
6. Conduct surveys related to the services or goods of **MEGA STORAGE COLOMBIA S.A.S.**
7. Develop programs in accordance with its bylaws.
8. Fulfill all contractual commitments.

2.3.4 Circulation

MEGA STORAGE COLOMBIA S.A.S. does not share the personal data it collects with third parties.

2.3.5 Deletion and/or final disposition

The owner of personal data has the right to request that **MEGA STORAGE COLOMBIA S.A.S.** delete (eliminate) it in any of the following circumstances:

1. If the data subject believes that it is not being processed in accordance with the principles, duties, and obligations set forth in current regulations.
If the data is no longer necessary or relevant for the purpose for which it was collected.
If the period necessary for the fulfillment of the purposes for which it was collected has exceeded. This deletion entails the total or partial elimination of personal information, as requested by the data subject, from records, files, databases, or processing operations carried out by **MEGA STORAGE COLOMBIA S.A.S.** However, this right of the data subject is not absolute, and consequently, **MEGA STORAGE COLOMBIA S.A.S.** may deny the exercise of this right when:
 2. The data subject has a legal or contractual obligation to remain in the database.

3. The deletion of data hinders judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes, or the updating of administrative sanctions.
4. The data is necessary to protect the legally protected interests of the data subject; to carry out an action based on the public interest; or to comply with a legally acquired obligation of the data subject.

2.4 Authorization for the Processing of Personal Data

MEGA STORAGE COLOMBIA S.A.S freely, expressly, and duly informedly requests authorization from data subjects, and has established appropriate mechanisms to ensure that the granting of such authorization can be verified in each case.

CHAPTER THREE

RIGHTS OF PERSONAL DATA SUBJECTS

3.1 Rights you have as data subjects.

The Fundamental Right to Habeas Data empowers data subjects to request access, update, rectification, and deletion of their personal data held by a third party. They may also revoke the authorization they have granted for processing. If a personal data subject believes that **MEGA STORAGE COLOMBIA S.A.S** has access to their personal data, they may at any time request access to their data, or if they believe that **MEGA STORAGE COLOMBIA S.A.S** is misusing their data, they may file a complaint.

Data subjects are entitled to request:

1. **Updating** their personal data if it is fragmented, incomplete, or otherwise.
2. **Rectification** and/or correction of their personal data if it is incorrect, partial, or misleading.
3. **Deletion** of their personal data from databases. The information will continue to be retained for the purposes established by law.
4. **Revocation** of the authorization for the processing of their personal data, provided that this does not result in a breach by **MEGA STORAGE COLOMBIA S.A.S** of other legal obligations regarding data retention.

3.2 Procedure for data subjects to exercise their rights

3.2.1 Consultation

Through the consultation mechanism, the data subject may request **MEGA STORAGE COLOMBIA S.A.S.** access to their personal information stored in the databases.

The consultation will be answered within a maximum of ten (10) business days from the date of receipt. If it is not possible to respond to the consultation within the

referenced timeframe, the subject will be informed of the reasons for the delay and a response will be given.

a maximum of five (5) business days following the expiration of the first term.

3.2.2 Complaint

Through the complaint mechanism, the data subject may complain to **MEGA STORAGE COLOMBIA S.A.S.** about any complaints regarding the use of their data.

The complaint will be addressed within a maximum of fifteen (15) business days, starting the day following the date of receipt. If it is not possible to address the complaint within this period, the subject will be informed of the reasons for the delay and will be given a response no later than eight (8) business days following the expiration of the first term.

If the complaint is incomplete, the subject will be required, within five (5) days following receipt of the complaint, to correct the deficiencies. After two (2) months from the date of the request, if the required information is not submitted, the claim will be deemed withdrawn. If **MEGA STORAGE COLOMBIA S.A.S** is not competent to resolve the claim, it will forward it to the appropriate party within a maximum of two (2) business days and inform the owner of the situation.

Persons authorized to submit a query or complaint

The persons authorized to request a query from **MEGA STORAGE COLOMBIA S.A.S** are the following:

Employees, contractors, suppliers, and collaborators who have had any relationship with **MEGA STORAGE COLOMBIA S.A.S**

Residents and clients

Visitors

Third parties authorized by the Owner or by law

In general, any owner of personal information whose data is stored in **MEGA STORAGE COLOMBIA S.A.S.** databases.

These cases are merely illustrative and are neither exclusive nor exclusive.

3.3.1 Information that the data subject must provide

For inquiries and complaints, the data subject must provide their identification information, such as:

1. Full name and surname
2. Identification type and number
3. Home address
4. Contact telephone number
5. Email address
6. Provide the necessary information to process your request.

In the case of a claim, you must attach the documents you wish to validate, support, or prove your request. If you are a minor, you must submit your request to the responsible adult, and at no time will you be denied the exercise of your rights.

3.4 Channels enabled for exercising Habeas Data Rights

MEGA STORAGE COLOMBIA S.A.S has the following channel enabled for data subjects to exercise their Habeas Data rights:

Email: datosmega@outlook.com Address: Calle 8 b N 65 -251

This is the only channel **MEGA STORAGE COLOMBIA S.A.S** has enabled for inquiries and complaints; therefore, data subjects must be aware of them.

3.5 Responsible for compliance with the Personal Data Protection Policy

The Administrative Department of **MEGA STORAGE COLOMBIA S.A.S** is responsible for effective compliance with the Policy, as well as for inquiries and complaints related to the protection of data subjects' personal data.

In any case, another area of **MEGA STORAGE COLOMBIA S.A.S** may be requested to verify compliance with the regulations regarding personal data protection.

CHAPTER FOUR FINAL PROVISIONS

4.1 Permanent Measures

In the processing of personal data, **MEGA STORAGE COLOMBIA S.A.S** will permanently verify in its processes, protocols, procedures, and policies that the right to habeas data is guaranteed to the data subjects and that the data subject's authorization for the processing of personal data is obtained, in accordance with the legal requirements.

4.2 Bindingness of the Policy

Any data subject who has any relationship with **MEGA STORAGE COLOMBIA S.A.S** must comply with this policy.

4.3 Internal Manual of Policies and Procedures for the Processing of Personal Data

This personal data processing policy is coordinated with the Internal Manual of Policies and Procedures for the Processing of Personal Data, which establishes the criteria, requirements, and procedures for the implementation of this policy.

4.4 Policy Approval and Effective Date

This policy entered into force on January 1, 2015.

Alejandra Galeano,

Legal Representative

MEGA STORAGE COLOMBIA S.A.S