



BIOXCELLERATOR S.A.S. PERSONAL DATA PROCESSING POLICY

Code:
PL-DIR-001

Version:
06

Creation Date:
11/01/2018

Updated date:
07/16/2025

1. ENTITY RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

Company name: Bioxcellerator S.A.S.

Tax ID (NIT): 901.074.877-8.

Address: Carrera 25 S No. 1 A sur 45, Tower 2, Office 944, Medellín, Colombia.

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2. SCOPE

The scope of this policy is to:

1. **Respond promptly and lawfully** to requests and claims submitted by data subjects, their successors, or any duly authorized person.
2. **Comply with current regulations** on personal data protection and with the principles of demonstrated responsibility (*accountability*).
3. **Guarantee the protection** of the rights and interests of the data subjects whose personal data are processed by Bioxcellerator S.A.S.

3. PURPOSE

The purpose of this Policy is to provide the necessary and sufficient information to the different stakeholder groups, as well as to establish the guidelines and procedures that guarantee the protection of the personal data processed by Bioxcellerator S.A.S. In compliance with current legislation, this policy seeks to ensure the proper collection, storage, use, structuring, circulation, organization, registration, consultation, and deletion of personal data, thereby guaranteeing respect for the rights of data subjects and compliance with applicable regulations, as well as the internal policies and procedures for handling requests submitted by data subjects.

4. GLOSSARY

Authorization: the consent given by any person so that companies or persons responsible for processing information may process their personal data.

Privacy notice: a mechanism through which, verbally or in writing, the data subject is informed about: the purpose of the processing, the existence of the information processing policies, and the ways in which they may access them.



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Public data: data relating to a person's marital status, profession or trade, and status as a merchant or public servant. For example: name, identification, marital status, among others.

Semi-private data: data that are not intimate, reserved, or public in nature, and whose knowledge or disclosure may be of interest not only to the data subject but also to a certain sector or society in general. For example: financial and credit data related to commercial or service activity.

Sensitive data: data relating to health, sex life, biometric data, as well as those related to racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in unions or social organizations, and data related to children and adolescents. For example: personal image, clinical data, fingerprint, medical history, clinical images, among others.

Data processor: a natural or legal person, public or private, who by itself or in association with others processes personal data on behalf of the data controller.

Data controller: a natural or legal person, public or private, who decides on the purpose of the databases and the processing thereof.

Deletion: a procedure through which the controller ceases processing the data, except when: a) the data subject has a legal or contractual duty to remain in the database; b) the deletion of data hinders judicial or administrative actions linked to tax obligations, the investigation and prosecution of crimes, or the updating of administrative sanctions; c) the data are necessary to protect the legally protected interests of the data subject, to carry out an action in the public interest, or to comply with a legally acquired obligation of the data subject.

Third party: a natural or legal person, public or private, other than the data subject and the data controller, who processes personal data on behalf of the controller and under its direct instructions.

Data subject: the natural person whose personal data are being processed.



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Processing: any operation or set of operations performed on personal data. For example: collection, storage, use, circulation, or deletion.

Transfer: an operation carried out by the data controller, within or outside Colombian territory, when it sends information to a third party that, in turn, becomes the controller of that data.

Transmission: an operation carried out by the data controller to a processor, within or outside Colombian territory, so that the latter may process the data under the controller's instructions and on its behalf.

5. GUIDING PRINCIPLES

In the development and application of the law, regulations, and rules in force in Colombia, the following principles shall apply comprehensively and harmoniously:

Principle of legality: The processing of personal data shall be carried out in accordance with the provisions of Law 1581 of 2012 and its regulatory decrees, including any rules that amend or repeal it, as well as all other provisions applicable to the matter.

Principle of purpose: Processing must have a legitimate purpose, in accordance with the Constitution and the law, and that purpose must be disclosed to the data subject.

Principle of freedom: Processing may only be carried out with the prior, express, and informed consent of the data subject. Data may not be obtained or disclosed without such authorization, except by legal or judicial mandate.

Principle of truthfulness or quality: Personal data must be truthful, complete, accurate, up to date, verifiable, and understandable. The processing of incomplete or erroneous data is prohibited.

Principle of transparency: The data subject has the right to obtain clear, complete, and accessible information about their personal data at any time, without restrictions, from the controller or processor responsible for handling such data.

Principle of restricted access and circulation: The processing of personal data must comply with the limits established by law, and the data may only be processed by persons authorized by the data subject or by those provided for in the regulations. Data, except for public data, may not be massively disclosed without adequate access controls.



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Principle of security: Technical, human, and administrative measures must be adopted to guarantee the security of personal data, protecting them against alteration, loss, unauthorized access, or fraudulent use.

Principle of confidentiality: All employees and contractors involved in the processing of personal data must guarantee the confidentiality of the information, even after their relationship with the entity has ended. Data may only be disclosed when authorized by law. **Bioxcellerator S.A.S.** is committed to processing personal data with strict confidentiality and to using them only for the purposes previously disclosed and consented to. In addition, it will adopt the technical and organizational security measures necessary to protect personal data against alteration, loss, or unauthorized access.

Principle of temporality: Personal data shall be kept only for the time necessary to fulfill the purposes for which they were collected, in compliance with legal provisions and administrative, accounting, tax, legal, and historical requirements. Once the purpose has been fulfilled, the data shall be deleted, unless their retention is necessary to comply with legal or contractual obligations.

Comprehensive interpretation of constitutional rights: The rights of data subjects shall be interpreted harmoniously and in balance with the right to information, in accordance with Article 20 of the Political Constitution, and with the other applicable constitutional rights.

Principle of necessity: Only personal data that are strictly necessary to fulfill the purposes defined in the database shall be processed.

6. SPECIAL CATEGORIES OF DATA

6.1.1. Sensitive data

6.1.2. Processing of sensitive data

As provided in Article 6 of Law 1581 of 2012, the processing of sensitive data is prohibited, except when:

- a) The data subject has given explicit authorization for such processing, except in cases where, by law, such authorization is not required.
- b) The processing is necessary to safeguard the vital interest of the data subject, and the data subject is physically or legally unable to give consent. In such cases, the legal representatives must provide authorization.



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c) The processing concerns data necessary for the recognition, exercise, or defense of a right in a judicial proceeding.

d) The processing has a historical, statistical, or scientific purpose. In such case, measures must be adopted to suppress the identity of the data subjects.

e) The processing is carried out in the course of the legitimate activities and with due safeguards by a foundation, NGO, association, or any other non-profit organization whose purpose is political, philosophical, religious, or trade-union related, provided that it refers exclusively to its members or to persons with whom it maintains regular contact.

6.1.3. Special authorization for sensitive personal data

Bioxcellerator S.A.S. will inform all data subjects, through the different means used to obtain authorization, that under Law 1581 of 2012 and its regulatory provisions, they are not required to grant consent for the processing of sensitive data.

In the case of data related to health, Bioxcellerator S.A.S. will implement the necessary measures to guarantee the confidentiality of such information. Sensitive biometric data will be processed exclusively for the purpose of identifying individuals, ensuring security, complying with legal obligations, and properly providing products and services.

6.2. Processing of personal data of children and adolescents

As provided in Article 12 of Decree 1377 of 2013, the processing of personal data of children and adolescents is prohibited, except when the data are public in nature and the following requirements are met:

- The processing must respond to the best interests of children and adolescents.
- Respect for their fundamental rights must be guaranteed.

If these requirements are met, the legal representative of the child or adolescent will grant authorization to Bioxcellerator S.A.S. for the processing, after evaluating the minor's opinion and considering their maturity, autonomy, and capacity to understand the situation.

6.3. Processing of personal data through video surveillance cameras

To obtain authorization for the processing of personal data through video surveillance systems, Bioxcellerator S.A.S. may use signs or visible notices in the



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monitored areas, especially at entry points and areas under surveillance. These notices must contain, at a minimum, the information required in a privacy notice, including the following:

- The identification of the data controller and its contact information.
- A description of the processing to be carried out and its purpose.
- The rights of the data subject.
- An indication of the physical and/or digital location where Bioxcellerator S.A.S.'s personal data processing policy may be consulted.

7. PROCESSING AND PURPOSES

In accordance with Law 1581 of 2012 and the authorizations granted by the data subjects, Bioxcellerator S.A.S. will carry out the following operations on personal data: collection, storage, consultation, use, organization, structuring, registration, circulation, and/or deletion. The processing will be carried out exclusively for the purposes authorized in this policy and in the specific authorizations granted by the personal data subjects.

Likewise, personal data will also be processed whenever there is a legal or contractual obligation.

Personal data will be processed according to the relevant stakeholder group and taking into account the specific purposes of each processing activity, as detailed below:

7.1. Purpose of processing patients' personal data

- 1) Acceder a y expedir copias de la historia clínica, con el fin de hacer posible la atención, realizar cobros o trámites de tipo administrativo.
- 2) Utilizar datos de la historia clínica con fines de investigación.
- 3) Obtener y registrar datos biométricos.
- 4) Realizar estudios científicos y académicos supervisados por un Comité de Ética, con el objetivo de contribuir al avance del conocimiento científico.
- 5) Permitir el acceso a los datos en el marco de proyectos de investigación científica, en los que podrán participar estudiantes y docentes de las instituciones y/o universidades con las que Bioxcellerator S.A.S. mantenga convenios o contratos.
- 6) Publicar y compartir de forma anónima información relativa a los datos personales suministrados, en juntas clínico-académicas, y en medios de comunicación académicos y científicos.



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- 7) Suministrar la información a terceros con los cuales Bioxcellerator S.A.S. tenga relación contractual, siempre que sea necesario entregársela para el cumplimiento del objeto contratado.
- 8) Acceder a la historia clínica para realizar análisis epidemiológicos, suprimiendo todos los datos de identificación del paciente.
- 9) Actualizar, rectificar y/o suprimir los datos entregados por el paciente.
- 10) Suministrar información de contacto a los prestadores de la red de servicios para garantizar a los pacientes el acceso oportuno a otros servicios de salud.
- 11) Para los fines relacionados con la atención médica y aplicación de tratamientos para el paciente.
- 12) Caracterizar y seguir a la población, para la gestión del riesgo en salud, utilizando la información derivada de los servicios asistenciales.
- 13) Entregar reportes de salud pública de obligatorio cumplimiento.
- 14) Evaluar los indicadores de oportunidad y calidad de los servicios.
- 15) Suministrar información a las autoridades competentes en caso de ser requerida.
- 16) Transferir a terceros dentro o fuera del país los datos personales para interconsultas, investigación, facturación y aprobación de servicios relacionados con la atención.
- 17) Realizar invitaciones a eventos y ofrecer nuevos productos y servicios.
- 18) Gestionar trámites (solicitudes, quejas, reclamos).
- 19) Efectuar encuestas de satisfacción respecto de los bienes y servicios ofrecidos por Bioxcellerator S.A.S.
- 20) Contactar al paciente a través de medios telefónicos o correo para realizar encuestas, estudios y/o confirmación de datos personales necesarios para la atención médica.
- 21) Transferir datos personales fuera del país al grupo empresarial al que pertenece Bioxcellerator S.A.S. para cumplir con las regulaciones antilavado de activos que le apliquen.
- 22) Gestionar la información necesaria para el cumplimiento de las obligaciones tributarias, contractuales, comerciales y de registros comerciales, corporativos y contables.
- 23) Transmitir la información a encargados nacionales o internacionales con los que se tenga una relación operativa que provean los servicios necesarios para la debida operación de Bioxcellerator S.A.S.



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- 24) Contactar al paciente a través de medios físicos, electrónicos y/o digitales para el envío de noticias relacionadas con campañas de fidelización o mejora de servicio.
- 25) Grabar, fijar, utilizar y divulgar la imagen personal del paciente, únicamente cuando exista autorización previa, expresa y por escrito.
- 26) Utilizar los datos personales del paciente con fines de divulgación, promoción y marketing de los productos y/o servicios ofrecidos por Bioxcellerator S.A.S.
- 27) Las demás finalidades que se determinen en procesos de obtención de datos personales para su tratamiento, y en todo caso de acuerdo con la Ley.

7.2. Finalidad del tratamiento de los datos personales de empleados

- 1) Hacer uso de los correos corporativos con el fin de facilitar el contacto entre empleados, prestadores de servicios y/o profesionales de la salud, enviar comunicaciones internas de interés, requerirlos en relación con sus funciones y hacerlos partícipes de las actividades institucionales.
- 2) Realizar procesos de promoción interna, verificación de títulos, solicitud de información a otras empresas o instituciones educativas, capacitaciones, contacto directo en caso de ser requerido.
- 3) Realizar todas las gestiones administrativas y financieras relacionadas directamente con la labor para la cual es contratado.
- 4) Para todos los fines relacionados con el objeto de los procesos de selección, contractuales o relacionados con éstos.
- 5) Realizar evaluaciones de desempeño, satisfacción laboral, crecimiento personal, bienestar y salud ocupacional.
- 6) Cumplir el proceso de afiliación al Sistema de Seguridad Social Integral (entidades promotoras de salud, administradoras de riesgos laborales, fondos de pensiones y cesantías, cajas de compensación).
- 7) Ejercer la defensa ante acciones legales, cumplir con exigencias judiciales o de otras autoridades competentes, derivadas directa o indirectamente de la vinculación contractual.
- 8) Suministrar la información a las autoridades competentes en caso de ser requerida.



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- 9) Suministrar la información a terceros con los cuales Bioxcellerator S.A.S. tenga relación contractual y que sea necesario entregársela para el cumplimiento del objeto contratado.
- 10) Actualizar, rectificar y/o suprimir los datos entregados por el empleado.
- 11) Enviar información, a través de Email, Mensajes de texto (SMS y/o MMS) o de cualquier otro medio de comunicación sobre el estado, deberes y derechos, así como las actividades asistenciales y administrativas que apoyan la prestación y el manejo del riesgo en salud.
- 12) Contactar al empleado a través de medios físicos, electrónicos y/o digitales para el envío de extractos, estados de cuenta o facturas en relación con las obligaciones derivadas del contrato celebrado entre las partes.
- 13) Transferir datos personales fuera del país al grupo empresarial al que pertenece Bioxcellerator S.A.S. para cumplir con las regulaciones antilavado de activos que le apliquen.
- 14) Transmitir la información a encargados nacionales o internacionales con los que se tenga una relación operativa que provean los servicios necesarios para la debida operación de Bioxcellerator S.A.S.
- 15) Gestionar la información necesaria para el cumplimiento de las obligaciones tributarias, contractuales, comerciales y de registros comerciales, corporativos y contables.
- 16) Gestionar trámites (solicitudes, quejas, reclamos).
- 17) Mantener un archivo digital que permita contar con la información correspondiente a cada contrato.
- 18) Realizar la búsqueda selectiva de antecedentes judiciales del empleado en forma *on line*, la consulta de antecedentes en las centrales de riesgo, así como las demás consultas que permitan la identificación del origen de sus ingresos (normatividad SARLAFT vigente).
- 19) Acceder a la información de la historia clínica ocupacional que por normatividades permitido conocer al empleador.
- 20) Publicar su foto y perfil en la página web oficial de Bioxcellerator S.A.S.
- 21) Publicar videos publicitarios y/o técnicos en la página web oficial de Bioxcellerator y otros medios de comunicación que puedan ser elaborados debido a las diferentes actividades institucionales.



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22) Gestionar la cadena presupuestal de Bioxcellerator S.A.S.: pagos de la entidad, emisión de certificados de ingresos y retenciones (personas naturales y jurídicas) y relaciones de pagos.

23) Las demás finalidades que se determinen en procesos de obtención de datos personales para su tratamiento, y en todo caso de acuerdo con la ley.

7.3. Finalidad del tratamiento de los datos personales de proveedores/contratistas

- 1) Para todos los fines relacionados con el objeto de los procesos de selección, contractuales o relacionados con estos.
- 2) Gestionar los contactos que se requieran para el manejo de la relación contractual.
- 3) Enviar por cualquier medio de comunicación la información relevante para la relación contractual.
- 4) Complementar el desarrollo de los contratos de prestación servicios, cuentas en participación, o relaciones civiles y/o comerciales, haciendo seguimiento y gestión al comportamiento comercial de los mismos.
- 5) Realizar todos los trámites internos y el cumplimiento de obligaciones contables, tributarias y de ley.
- 6) Realizar todas las actividades necesarias para el cumplimiento de las diferentes etapas contractuales en las relaciones con proveedores y contratistas.
- 7) Mantener un archivo digital que permita contar con la información correspondiente a cada contrato.
- 8) Gestionar trámites (solicitudes, quejas, reclamos).
- 9) Gestionar la información necesaria para el cumplimiento de las obligaciones tributarias, contractuales, comerciales y de registros comerciales, corporativos y contables.
- 10) Transferir datos personales fuera del país al grupo empresarial al que pertenece Bioxcellerator S.A.S. para cumplir con las regulaciones antilavado de activos que le apliquen.
- 11) Transmitir la información a encargados nacionales o internacionales con los que se tenga una relación operativa que provean los servicios necesarios para la debida operación de Bioxcellerator S.A.S.



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- 12) Contactar al proveedor/contratista a través de medios físicos, electrónicos y/o digitales para el envío de extractos, estados de cuenta o facturas en relación con las obligaciones derivadas del contrato celebrado entre las partes.
- 13) Actualizar, rectificar y/o suprimir los datos entregados por el proveedor/contratista.
- 14) Realizar todas las gestiones administrativas y financieras relacionadas directamente con la labor para la cual es contratado.
- 15) Gestionar la cadena presupuestal de Bioxcellerator S.A.S.: pagos de la entidad, emisión de certificados de ingresos y retenciones (personas naturales y jurídicas) y relaciones de pagos.
- 16) Las demás finalidades que se determinen en procesos de obtención de Datos Personales para su tratamiento, y en todo caso de acuerdo con la Ley.

Esta descripción resume las finalidades del tratamiento de los datos personales, incluyendo aquellas aplicables a datos sensibles de pacientes, empleados y proveedores o contratistas. El tratamiento de dicha información se realizará exclusivamente conforme a las finalidades establecidas en las autorizaciones y/o consentimientos informados otorgados por los titulares. En caso de modificaciones sustanciales a dichas finalidades, Bioxcellerator S.A.S. informará oportunamente a los titulares y gestionará la obtención de una nueva autorización o consentimiento, según corresponda.

8. TRANSFER AND TRANSMISSION OF PERSONAL DATA

Bioxcellerator S.A.S. may transfer and transmit personal data to third parties with whom it has an operational relationship, such as service providers necessary for its operation, or in compliance with the legal functions applicable to it. In these cases, measures will be adopted to ensure that the parties accessing the data comply with the internal processing policy and with personal data protection obligations, in accordance with the law.

When Bioxcellerator S.A.S. transmits personal data to processors located inside or outside Colombia, it will enter into a contract that establishes:

- The scope of the data processing.
- The activities that the processor will carry out on behalf of the controller.



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- The obligations of the processor with respect to the data subject and the data controller.

This contract will ensure that the processor complies with the controller's data processing policy, carries out the processing in accordance with the purpose authorized by the data subjects, and complies with applicable laws. In addition to legal obligations, the contract must include:

- Processing of data in accordance with the protection principles established by law.
- Safeguarding the security of databases containing personal information.
- Confidentiality regarding the processing of personal data.

In this way, it is ensured that all data processors comply with the protection standards established by current regulations, especially Law 1581 of 2012 and other complementary rules.

9. RIGHTS AND CONDITIONS OF LEGALITY FOR DATA PROCESSING

In the processing of personal data by Bioxcellerator S.A.S., the rights of personal data subjects will always be respected, including the following:

- a) To access, free of charge, the data provided that have been subject to processing.
- b) To know, update, and rectify their information in relation to partial, inaccurate, incomplete, fragmented data, data that may be misleading, or data whose processing is prohibited or was not authorized.
- c) To request proof of the authorization granted, or any other document signed by the personal data subject for that purpose, except when such authorization is expressly exempted as a requirement for data processing under the law.
- d) To file complaints before the Superintendence of Industry and Commerce (SIC) for violations of current regulations, after first submitting the complaint or claim directly to the data controller so that it may respond in the first instance.
- e) To revoke authorization and/or request deletion of the data, provided there is no legal or contractual duty preventing its deletion.



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- f) To refrain from answering questions about sensitive data. Responses concerning sensitive data or data of children and adolescents are optional.
- g) To be informed by the entity or the data processor, upon request, about the use made of their data.

10. DATA SUBJECT AUTHORIZATION

The processing of personal data requires the prior and informed authorization of the data subject, except for legal exceptions. This authorization may be obtained through means that allow subsequent consultation, such as:

- In writing.
- Orally.
- Through clear conduct by the data subject, such as sending a résumé or entering facilities with knowledge of video surveillance systems.

However, the authorization must be clear and verifiable in order to comply with legal requirements.

10.1. Persons to whom information may be disclosed

Information that meets the conditions established by law may be disclosed to the following persons:

- The data subjects, their successors, or their legal representatives.
- Public or administrative entities in the exercise of their legal functions or by court order.
- Third parties authorized by the data subject or by law.

The data subject must prove their identity by means of a copy of their identification document or the relevant supporting document, which may be submitted in physical or digital format. If the data subject is represented by a third party, the corresponding power of attorney specifying the powers granted must be provided. In addition, the attorney-in-fact must prove their identity in accordance with the requirements established by law.



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11. DUTIES OF DATA CONTROLLERS AND PROCESSORS

11.1. Duties of data controllers

Bioxcellerator S.A.S., as the data controller, shall comply with the following duties, without prejudice to the other provisions established by law and any others governing its activities:

- a) Guarantee the data subject, at all times, the full and effective exercise of the right to *habeas data*.
- b) Request and retain, under the conditions provided by law, a copy of the relevant authorization granted by the data subject.
- c) Properly inform the data subject about the purpose of collection and the rights granted to them by virtue of the authorization provided.
- d) Preserve the information under the security conditions necessary to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access.
- e) Ensure that the information provided to the processor is truthful, complete, accurate, up to date, verifiable, and understandable.
- f) Update the information by timely communicating to the processor all developments regarding the data previously provided and adopt the other necessary measures so that the information supplied remains current.
- g) Correct the information when it is inaccurate and communicate the relevant correction to the processor.
- h) Provide the processor, as applicable, only with data whose processing has been previously authorized in accordance with the law.
- i) Require the processor, at all times, to respect the security and privacy conditions of the data subject's information.



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- j) Process the consultations and claims submitted under the terms established by law.
- k) Adopt specific procedures to ensure proper compliance with the law and, in particular, for handling consultations and claims.
- l) Inform the processor when certain information is under dispute by the data subject, once the claim has been filed and the corresponding proceeding has not yet been completed.
- m) Inform the data subject, upon request, about the use made of their data.
- n) Inform the data protection authority when security code breaches occur and there are risks in the administration of data subjects' information.

11.2. Duties of data processors

Data processors, including Bioxcellerator S.A.S. when acting in such capacity, shall comply with the following duties, without prejudice to the other provisions established by law and any others governing their activities:

- a) Guarantee the data subject, at all times, the full and effective exercise of the right to *habeas data*.
- b) Preserve the information under the security conditions necessary to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access.
- c) Timely update, correct, or delete the data under the terms of Law 1581 of 2012 and the other related and currently applicable regulations.
- d) Update the information reported by the controllers within five (5) business days from receipt.
- e) Process the consultations and claims submitted by data subjects under the terms established in this policy.



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f) Adopt an internal manual of policies and procedures to ensure proper compliance with the law and, in particular, to handle consultations and claims submitted by data subjects.

g) Record in the databases the note "claim in process" in the manner regulated by law.

h) Insert in the database the note "information under judicial dispute" once notified by the competent authority of judicial proceedings related to the quality of the personal data.

i) 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.

j) Allow access to the information only to persons who are authorized to access it.

k) Inform the Superintendence of Industry and Commerce when security code breaches occur and there are risks in the administration of data subjects' information.

l) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

m) Verify that the data controller has authorization for the processing of the data subject's personal data.

12. AREA RESPONSIBLE FOR HANDLING PETITIONS, CONSULTATIONS, AND CLAIMS

To exercise their rights, the subjects of personal data processed by Bioxcellerator S.A.S. must submit their petitions, consultations, and claims to:

- Bioxcellerator S.A.S. Quality Department
- Phone: 6041815



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- Email: contac@bioxcellerator.com
- Address: Carrera 25 S No. 1 A sur 45, Tower 2, Office 944, Medellín, Colombia.
- Website: <https://www.bioxcellerator.com.co/transparencia/>

Consultations, petitions, and claims submitted must contain at least the following information:

- First and last names of the data subject and/or their representative and/or successors;
- A clear and specific description of what is being requested;
- Physical address, email address, and contact phone number of the data subject and/or their successors or representatives;
- Signature, identification number, or the corresponding validation procedure;
- Submission through the consultation channels enabled by Bioxcellerator S.A.S.

13. PROCEDURE FOR ADDRESSING DATA SUBJECTS' RIGHTS

13.1. Procedure for handling consultations

Bioxcellerator S.A.S. and/or its processors guarantee data subjects whose personal data are contained in its databases, as well as their successors or authorized persons, the right to consult all information contained in their individual records or any information linked to their identification, as established in this personal data processing policy.

Response time for consultations:

Requests received through the above channels will be answered within a maximum term of ten (10) business days counted from the date of receipt.



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Extension of the consultation response period:

If it is not possible to answer the consultation within that term, the interested party will be informed before the expiration of the ten (10) days, stating the reasons for the delay and the date on which the consultation will be answered, which in no case may exceed five (5) business days following the expiration of the initial term.

13.2. Procedure for handling claims

Rights guaranteed through the claims procedure

a) **Correction or update:** Bioxcellerator S.A.S. will guarantee data subjects, or their successors, the right to request the updating or correction of the information contained in its databases.

b) **Revocation of authorization or deletion of personal data:** Bioxcellerator S.A.S. will guarantee data subjects, or their successors, the right to request revocation of the authorization granted, deletion of their personal data, and to submit claims for non-compliance with Law 1581 of 2012, as well as any rule that amends, supplements, or replaces it.

Claims lacking legal requirements: If the claim is submitted without compliance with the above legal requirements, the claimant will be asked within five (5) days following receipt of the claim to correct the deficiencies and provide the missing information or documents.

Abandonment of the claim: If two (2) months pass from the date of the request without the applicant providing the required information, it will be understood that the claim has been abandoned.

Receipt of claims not addressed to Bioxcellerator S.A.S.: If Bioxcellerator S.A.S. receives a claim intended for another organization, it will forward it to the appropriate party within a maximum term of two (2) business days and will inform the claimant of the situation.



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Inclusion of a note in the database: Once the claim has been fully received, within a maximum term of two (2) business days from receipt, Bioxcellerator S.A.S. will include in the database where the data subject's personal data are stored a note stating "claim in process" and the reason for it. This note must remain until the claim is decided.

Response time for claims: The maximum term for answering the claim will be fifteen (15) business days counted from the day after the date of receipt.

Extension of the response period: When it is not possible to answer the claim within that term, the interested party will be informed of the reasons for the delay and the date on which the claim will be answered, which in no case may exceed eight (8) business days following the expiration of the initial term.


Procedure for deletion of personal data: If deletion of the personal data of the data subject in the database is deemed appropriate based on the claim submitted, Bioxcellerator S.A.S. must operationally carry out the deletion so that the information cannot be recovered.

14. DATABASE RETENTION PERIOD

Bioxcellerator S.A.S.'s databases will remain in force for the period corresponding to the purpose for which their processing was authorized and in accordance with the special regulations governing the matter.

15. NATIONAL DATABASE REGISTRY

In accordance with Article 25 of Law 1581 and its regulatory decrees, Bioxcellerator S.A.S. will register its databases, together with this personal data processing policy, in the National Database Registry administered by the Superintendence of Industry and Commerce.

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16. EFFECTIVE DATE, VERSIONS, AND POLICY UPDATES

This personal data processing policy becomes effective upon signature, complements the associated policies, and remains in force indefinitely.

Any substantial change to the personal data processing policies will be communicated in a timely manner to data subjects through the usual contact channels and/or through the website: <https://www.bioxcellerator.com.co/transparencia/>

For data subjects who do not have access to electronic means or whom it is not possible to contact, notice will also be provided through public postings at BioXcellerator S.A.S.'s main office.

17. MANAGEMENT'S DECLARATION OF COMMITMENT TO THE POLICY

Bioxcellerator's management and its sites are committed to complying with and enforcing this policy in order to maintain the trust that users/patients, clients, suppliers, employees, and other stakeholders place in BioXcellerator. Management will allocate sufficient resources and issue the corresponding directives to ensure compliance with the personal data protection policy and to safeguard information responsibly and securely.

18. EXCEPTIONS TO COMPLIANCE WITH THE POLICY

No exceptions apply to this policy.

19. MEASUREMENT OF ADHERENCE

Monitoring complaints related to violations of data privacy involving any of the clinic's stakeholders.

20. RISKS

That data subjects provide false, incomplete, or untimely information during the admission process at the institution. To control this risk, the user identification procedure with a valid document has been established.



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That the authorization-signing guidelines (*Habeas Data*) for patients are not followed by those responsible in the processes. Compliance is verified through the internal audit process.

That the custody and reliability of the data are not guaranteed as required by current regulations. To control this risk, documented information custody and security procedures are in place, and adherence is verified through the different internal audits.

21. TECHNICAL OR BIBLIOGRAPHIC REFERENCES

Law 1581 of 2012: Establishes general provisions for the protection of personal data.

Decree 1377 of 2013: Partially regulates Law 1581, especially regarding authorization for data processing.

Decree 886 of 2014: Regulates the National Database Registry.

Model formats guide for compliance with the obligations established in Law 1581 of 2012 and its regulatory decrees, Ministry of Commerce, Industry and Tourism.

22. MANAGEMENT SIGNATURE AND COMMITMENT

Signed in Medellín, on July 16, 2025.

KAROLYNN HALPERT CORREA
General Manager



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23. ACKNOWLEDGMENTS.

	Prepared by	Reviewed / Updated by	Approved by
Name	Olga Lucía Restrepo Vélez	Laura Ceballos Stephania Cabrera Legal Advisors Ivette Arce Palacios	Karolynn Halpert Correa
Position	Quality and Human Talent Director	Quality Director	Medical Manager
Date	11/1/2018	07/02/2025	07/16/2025

24. CHANGE CONTROL.

Date	Change Implemented	Responsible	Version		Version
			Yes	No	
1/11/2018	Document created	Olga Lucía Restrepo Vélez		X	1
1/06/2019	Update of responsible parties and scope; addition of risks; review of the regulatory framework.	Olga Lucía Restrepo Vélez	X		2
5/03/2021	The Research department was added as a responsible party for the databases.	Santiago Saldarriaga Gómez	X		3
24/02/2022	Update of the new facility address information; expansion of information uses for research; expansion of risks and their management.	Olga Lucía Restrepo Vélez	X		4
14/10/2022	A provision was added stating that BIOXCELLERATOR shall comply with all principles set forth in Article 4 of Law 1581 of 2012, in accordance with its installed capacity, financial resources, and administrative structure, in order to demonstrate due diligence in the processing of personal data of data subjects.	José Daniel Sepúlveda Ríos	X		5



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Date	Change Implemented	Responsible	Version		Version
			Yes	No	
	<p>Definitions were updated.</p> <p>The following was added: “and any other laws, decrees, resolutions, and circulars that add to, amend, repeal, or regulate the general regulatory framework on the protection of personal data in the Republic of Colombia.”</p> <p>In section 12, “Processing of Personal and Sensitive Data and Its Purpose,” an additional purpose was included, namely: to carry out recruitment activities for personnel or third-party suppliers of products or services, as well as to manage financial and accounting activities related to the monetary obligations arising from these contractual relationships.</p> <p>In the bullet point stating “to file a complaint with the Superintendence...”, the following condition was added: provided that, prior to filing the complaint, the data subject has submitted the complaint or claim directly to the data controller so that it may be addressed in the first instance.</p> <p>In the section “Handling of Requests, Inquiries, and Complaints,” the following text was added after the end of the first paragraph: “Data subjects may exercise their right to habeas data by contacting the phone number [quality and improvement department contact], by email at contac@Bioxcellerator.com, or by appearing in person at Carrera 25 A No. 1 A Sur – 45, Office 944, El Tesoro</p>				



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Date	Change Implemented	Responsible	Version		Version
			Yes	No	
	<p>Shopping Center, Medical Tower No. 2, in the city of Medellín.”</p> <p>The response timeframe was corrected to state: “...within ten (10) or fifteen (15) business days following the request, depending on whether it is an inquiry or a complaint.” Additionally, the following clarification was added later in the paragraph: “...which in no case may exceed five (5) additional business days following the initial deadline in the case of inquiries, or eight (8) additional business days following the initial deadline in the case of complaints.” This correction reflects the provisions expressly established in Articles 14 and 15 of Law 1581 of 2012.</p> <p>In the section “Duties of Data Processors,” the following duty was added: “to process and use the personal data shared by the data controller solely and exclusively for the purposes authorized by the controller, under the agreed terms and conditions”.</p>				
09/12/2024	The policy was reviewed, remains in force, and was communicated to interested parties.	Karolynn Halpert		X	05
16/07/2025	<p>The scope is expanded to include principles such as demonstrated accountability and to detail regulatory compliance.</p> <p>A specific section is included on video surveillance, the processing of minors’ personal data, and special authorization for sensitive data.</p> <p>The purposes of data processing are clearly classified according to</p>	Laura Ceballos Stephanía Cabrera Ivette Arce	X		06



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Date	Change Implemented	Responsible	Version		Version
			Yes	No	
	stakeholder groups: patients, employees, and suppliers/contractors. Procedures for inquiries and complaints are detailed, including deadlines, conditions, and legal consequences. A comprehensive section is included on data transfer agreements, the obligations of data processors, and applicable international standards.				