

## PRIVACY POLICY FOR FIDECO

**FIRMENICH S.A.**, in compliance with the provisions of Law 1581 of 2012 "By which general provisions are issued for the protection of personal data" and of Decree 1377 of 2013, makes available to you this Privacy Policy aimed at establishing the criteria for the collection, storage, use, circulation and deletion of personal data processed by this organization.

### SCOPE:

This policy applies to all personal information recorded in the databases of **FIRMENICH S.A.**, acting as Data Controller for the purpose of guaranteeing that its customers, suppliers, employees and third parties in general, may know, include, update, rectify and exclude personal information contained and processed in the databases managed by **FIRMENICH S.A.**

Currently, **FIRMENICH S.A.**, collects information through physical, audiovisual and virtual means such as, information formats of business associates; contracts for the supply of services and/or sale of products; through the website on our contact form and through video surveillance systems.

### APPLICABLE LAW:

This policy shall be governed by the laws of the Republic of Colombia, in particular, by Law 1581 of 2012, by Decree 1377 of 2013, and others that add, modify or complement them.

### DATA CONTROLLER:

**FIRMENICH S.A.**, Commercial company, legally incorporated, identified with TIN 860.030.605-4, with main address in Avenida el Dorado No. 98-43 in the city of Bogotá. Tel 57 (1) 4254343 - E-mail: [complianceofficer@firmenich.com](mailto:complianceofficer@firmenich.com) and [data.privacy@firmenich.com](mailto:data.privacy@firmenich.com)

### DEFINITIONS:

- a) **Authorization:** prior, express and informed consent of the holder to carry out the processing of personal data.



- b) **Privacy Notice:** Verbal or written communication generated by the data controller and addressed to the holder for the processing of their personal data, by means of which they are informed about the existence of the information Processing policies that will be applicable, and the purpose of the intended Processing of personal data.
- c) **Database:** Organized set of personal data to be processed.
- d) **Personal data:** Any information that is linked to or may be associated to one or more certain or ascertainable natural persons.
- e) **Public data:** Data that is not semi-private, private or sensitive. Data relating to the civil status of persons, their profession or occupation and their status as traders or public servants are considered public data, among others. By their nature, public data may be contained in, inter alia, public records, public documents, official gazettes and bulletins and duly enforceable court rulings that are not subject to reserve.
- f) **Sensitive data:** Sensitive data is defined as data that affect the privacy of the Data Subject or whose misuse may lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership of trade unions, social organizations, human rights organizations or those promoting the interests of any political party or guaranteeing the rights and guarantees of opposition political parties, as well as health data, sexual life, and biometric data.
- g) **Data Processor:** A natural or legal person, public or private, who by itself or in association with others, performs the processing of personal data on behalf of the Data Controller. For the purposes of this policy, shall be the Third Parties that have access to the databases of **FIRMENICH S.A.** and, therefore shall comply with the provisions of Law 1581 of 2012, Decree 1377 of 2013, the regulations that complement or modify this Policy.
- h) **Data Controller:** A natural or legal person, public or private, who by itself or in association with others, decides on the basis of the data and/or the processing of the data. In our case the data controller is **FIRMENICH S.A.**
- i) **Third parties:** Any legal or natural person other than the persons who directly belong to **FIRMENICH S.A.**
- j) **Transfer:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, updating or deletion.



- k) **Transmission:** Processing of personal data that implies the communication of the same inside or outside the territory of the Republic of Colombia when it is intended to carry out a Processing by the Data processor on behalf of the Data controller.
- l) **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

#### **PROCESSING AND PURPOSE:**

The following are the purposes of the processing carried out by **FIRMENICH S.A.** with the personal information of each of its stakeholders:

#### **CUSTOMER INFORMATION:**

1. Carry out the procedures related to the development of the company's corporate purpose, in relation to the fulfillment of the object of the contract or agreement entered into with the Holder of the information. This in accordance with the provisions of the Commercial Code and other rules that specifically regulate the matter. Such purposes include: service satisfaction surveys, accounting of invoices in our accounting software, tax data for tax purposes before the DIAN, carrying out processes to update the information collected and reporting new products and/or services.
2. Development of commercial, advertising and marketing campaigns related to our products.
3. Shipments of commercial samples.
4. Communication through means arranged by the company for commercial purposes.
5. Completion of information formats and updating of information provided by **FIRMENICH S.A.** to obtain proper knowledge of its clients.
6. Make invitations to private trainings.
7. Attention to requests, queries, petitions, complaints and/or claims presented by the holders of the information.
8. Socialization of policies and projects.
9. Provide information to third parties with whom **FIRMENICH S.A.** has a contractual relationship and which is necessary to deliver for the fulfillment of the object of the contract.
10. Collect data through video surveillance systems, security cameras and telephone recording systems, to guarantee the security of goods and / or people associated with **FIRMENICH S.A.** among others.
11. Response to requests from legal authorities.
12. Creation of internal databases of personal information collected.



## **EMPLOYEE INFORMATION:**

1. Completion of information formats and updating of information provided by **FIRMENICH S.A.** to obtain proper knowledge of its Employees.
2. Carry out the procedures related to the development of the company's corporate purpose in relation to the fulfillment of the object of the contract or agreement entered into with the holder of the information. This is in accordance with the provisions of the Substantive Labour Code and other relevant regulations.
3. Mailing, trading samples of products and corporate gifts for the celebration of special days.
4. Attention to requests, queries, petitions, complaints and/or claims filed by the holders of the information and/or legal authorities.
5. Provide information to third parties with whom **FIRMENICH S.A.** has a contractual relationship and which is necessary to deliver for the fulfillment of the object of the contract.
6. Enrollment to the social security system.
7. Registration to welfare activities planned by **FIRMENICH S.A.** as data controller.
8. Collect data through video surveillance systems, security cameras and telephone recording systems, to guarantee the security of goods and / or people associated with **FIRMENICH S.A.** among others.
9. Creation of internal databases of personal information collected.

## **FORMER EMPLOYEE INFORMATION.**

**FIRMENICH S.A.** shall have a file in which the personal data of all Employees who have terminated their employment relationship will be stored indefinitely for the following purposes:

1. Serve as a basis for the issuance of the labor certificates referred to in Article 57, numeral 7 of the Substantive Labor Code, at the request of the Former Employee or the successor in title thereof.
2. Granting of employment references to potential employers of the Former Employee, when the latter authorizes it at the time of termination.
3. Inclusion of the former employee in the personnel hiring processes carried out by **FIRMENICH S.A.**

## **SUPPLIER INFORMATION:**

1. Follow up on financial fitness.
2. Assess the services provided by suppliers and the opportunity in the delivery and performance of activities.



3. Carry out the procedures related to the development of the company's corporate purpose, in relation to the fulfillment of the object of the contract or agreement entered into with the holder of the information. This in accordance with the provisions of the Commercial Code and other rules that specifically regulate the matter. Such purposes include: service satisfaction surveys, accounting of invoices in our accounting software, tax data for tax purposes before the DIAN, carrying out processes to update the information collected and fulfilling the request for new products and/or services.
4. Communication through means arranged by the company for commercial purposes.
5. Completion of information formats and updating of information provided by **FIRMENICH S.A.** to obtain proper knowledge of their suppliers.
6. Make invitations to trainings and/or private tenders.
7. Attention to requests, queries, petitions, complaints and/or claims presented by the holders of the information.
8. Socialization of policies and projects.
9. Provide information to third parties with whom **FIRMENICH S.A.** has a contractual relationship and which is necessary to deliver for the fulfillment of the object of the contract.
10. Collect data through video surveillance systems, security cameras and telephone recording systems, to ensure the security of property and/or persons associated with **FIRMENICH S.A.** among others.
11. Response to requests from legal authorities.
12. Creation of internal databases with the personal information collected.

#### **PROCESSING OF INFORMATION COLLECTED THROUGH VIDEO SURVEILLANCE SYSTEMS AND/OR MULTIMEDIA RESOURCES.**

All persons entering the facilities of **FIRMENICH S.A.** regardless their association or the purpose for which they enter their facilities may be photographed, recorded or filmed through video surveillance systems. This material may be used for the following purposes:

1. Make live broadcasts, make videos and other material for corporate purposes.
2. Create databases with data collected through video surveillance systems.
3. Deliver material collected by order of administrative or legal authority, or for the purpose of carrying out an investigation, provided that it does not contain information on minors, in which case it must have the express authorization of its legal representative.
4. Referral to employees for the performance of their duties and/or verification set forth in the Internal Labour Regulations.

**Firmenich S.A.**

Avenida El Dorado No. 98-43, Bogotá, D.C. Tel:+57 1 425 43 43  
[www.firmenich.com](http://www.firmenich.com)



## **PROCESSING OF INFORMATION FOR SECURITY AND SURVEILLANCE PURPOSES**

1. Transmission of data to expert companies in private security, who, as Data processors, shall process the data in accordance with the protocols and standards regulating said activity.
2. Creation of internal databases.

Any person who enters the facilities of **FIRMENICH S.A.** may not authorize the processing of their personal data from the photographic or video records made by the aforementioned Data processor. For this purpose, the non-authorization format for the processing of personal data shall be requested and completed.

In this case, such records shall have, only, the processing indicated in paragraph 1, and shall subsequently be destroyed, in accordance with the respective practices of the private security companies acting as Data processor.

## **PROCESSING OF SENSITIVE DATA:**

Bearing in mind that the misuse of sensitive data may affect the Holder or lead to discrimination, **FIRMENICH S.A.** shall not request sensitive data from natural persons unless, this is essential for the fulfillment of the legal and/or contractual obligations entered into with the Holder, in which case the delivery of the data must be made with prior authorization or concomitant to the delivery of the data.

The foregoing, provided that the law indicates that authorization is not required.

In any case, requests for information on sensitive data are optional for the natural person, and this does not imply a denial of the provision of services or that the corresponding employment or contractual relationship is not maintained unless sensitive data are essential to that relationship.

## **RIGHTS OF HOLDERS:**

1. Free access to the data provided that have been processed.
2. Know, update and rectify your information against partial, inaccurate, incomplete, fractionated, misleading, or those whose processing is prohibited or has not been authorized.
3. Request proof of authorization granted.
4. Submit to the Superintendency of Industry and Commerce complaints for violations of the provisions of current regulations.



5. Revoke the authorization and/or request the deletion of the data, provided that there is no legal or contractual duty that prevents eliminating them.
6. Refrain from answering questions on sensitive data, bearing in mind that answering them shall be optional.

#### **ATTENTION TO PETITIONS, INQUIRIES AND COMPLAINTS:**

The Data Processor Officer is in charge of processing the requests of the Holders to enforce their rights, for the effect of the above **FIRMENICH S.A.** has provided the following channels:

- By e-mail: [complianceofficer@firmenich.com](mailto:complianceofficer@firmenich.com) and [data.privacy@firmenich.com](mailto:data.privacy@firmenich.com)

Likewise, and in a subsidiary manner through the Superintendence of Industry and Commerce, the holder may file complaints for violations of the provisions of Law 1581 on data protection; at the link <http://www.sic.gov.co/manejo-de-informacion-personal>.

#### **PROCEDURE FOR THE EXERCISE OF HABEAS DATA:**

In compliance with the rules on the protection of personal data **FIRMENICH S.A.** presents the procedure and minimum requirements for the exercise of your rights:

For the filing and attention of your request, the Holder shall provide the following information:

1. Name and surname
2. Contact details (physical and/or electronic address and contact numbers).
3. Means of receiving a response to your request.
4. Reasons, facts that give rise to the complaint with a brief description of the right you wish to exercise (know, update, rectify, request proof of the authorization granted, revoke it, delete, access to the information).
5. Signature and identification number.

The maximum term provided by law to resolve your claim is fifteen (15) working days, counted from the day following the date of its receipt. When it is not possible to address the claim within this term, **FIRMENICH S.A.** shall inform the interested party of the reasons for the delay and the date on which their claim shall be addressed, which in no case may exceed eight (8) working days following the expiration of the first term.



Once the terms indicated by Law 1581 of 2012 and the other regulations that regulate or complement it have been fulfilled, the Holder who is denied, totally or partially, the exercise of the rights of access, updating, rectification, deletion and revocation may bring its case to the attention of the Superintendency of Industry and Commerce – Delegation for the Protection of Personal Data-.

#### **CHANGES TO THE POLICY OR THE PRIVACY NOTICE:**

The processing policies are available on the [www.firmenich.com](http://www.firmenich.com) so any substantial changes to them shall be informed through this same means and subsequently, in any other that is considered relevant.

Substantial changes to the privacy notice shall be reported in a timely manner by the same virtual means.

#### **SECURITY MEASURES:**

**FIRMENICH S.A.** maintains the technical, human, administrative and technological measures necessary for the security of the information, to avoid adulteration, loss, consultation, use or unauthorized access or fraudulent intentions.

#### **AUTHORIZATION:**

For **FIRMENICH S.A.** the processing of personal data must be carried out following its internal procedure, which starts with obtaining a prior and informed authorization from the holder unless the data are of a public nature.

**FIRMENICH S.A.** has adopted a procedure to request authorization for the collection of personal data and it is the responsibility of officials to inform the purposes for which they shall be stored, guaranteeing them the possibility of verifying the granting of such authorization.

By virtue of the foregoing, the Holder undertakes to provide true, accurate, authentic and current information and is responsible for the content of the same and the damages caused to **FIRMENICH S.A.** or third parties. The holder must keep the information up to date at all times.

#### **TERM AND DURATION**

This Policy for the Processing of Personal Data applies from July 1<sup>st</sup> 2021. The databases in which the personal data shall be recorded shall be valid for as long as the information is maintained and used for the purposes





described in this policy. Once this(s) purpose(s) is fulfilled and provided that there is no legal or contractual duty to keep your information, your data will be deleted from our databases.

**EXCEPTIONS TO THE APPLICATION OF THE FOLLOWING POLICY:**

Under the provisions of Law 1581 of 2012 **FIRMENICH S.A.** may proceed with the processing of personal data without requiring authorization in the following cases:

1. Information required by a public or administrative entity in the exercise of its legal functions or by a court order.
2. Data of a public nature.
3. Medical or health emergencies.
4. Processing of information authorized by law for historical, statistical or scientific purposes.
5. Data relating to the civil status of persons.

**POLICY MANAGEMENT**

	<b>DATE OF ISSUE</b>	<b>EFFECTIVE DATE</b>	<b>PURPOSE OF CHANGE</b>
1	August 2019	August 2019	New document release
2	August 2021	August 2021	Creation of a policy different from the privacy notice – inclusion of a detailed description of the purpose and principles of the policy and the data protection officer email to respond holder’s requeriments.