RNT 289371

OBRA HOTELS

DATA PRIVACY AND INFORMATION HANDLING POLICY

DATA PRIVACY AND INFORMATION HANDLING POLICY
LAW 1581 OF 2012 AND ITS REGULATORY DECREES, LAW 1266 OF 2008 AND LAW 2573 OF 2026

DATA CONTROLLER
NAME: Distrito Obrador S.A.S.
TAX ID (NIT): 902042734-1
ADDRESS: Calle 9 # 43C-41, Astorga Neighborhood, Medellín, Antioquia, Colombia
EMAIL: gerencia@obrahotels.com
WEBSITE: https://obrahotels.com/

1. PURPOSE
To establish and disclose the Information Processing and Personal Data Protection Policies implemented by Distrito Obrador S.A.S., in order to ensure proper compliance with Law 1581 of 2012 and its regulatory decrees, which are intended to develop the constitutional right of all individuals to know, update and rectify information collected about them in databases or files, as well as the other constitutional rights, freedoms and guarantees referred to in Article 15 of the Political Constitution concerning Habeas Data, and the right to information established in Article 20 thereof.

Distrito Obrador S.A.S. adopts an internal policy and procedure manual to ensure compliance with this provision and the applicable regulations.

2. SCOPE

This document applies to personal data recorded in any database managed by the Company and subject to Processing.

3. DEFINITIONS

3.1. Authorization: Prior, express and informed consent given by the Data Subject to carry out the processing of personal data.

3.2. Database: An organized set of personal data subject to Processing.

3.3. Personal Data: Any information linked to or that may be associated with one or more identified or identifiable natural or legal persons.

3.4. Data Processor: A natural or legal person, public or private, who, individually or jointly with others, processes personal data on behalf of the Data Controller.

3.5. Data Controller: A natural or legal person, public or private, who, individually or jointly with others, makes decisions regarding the database and/or the processing of personal data. In this case, the Data Controller is Distrito Obrador S.A.S.

3.6. Data Subject: A natural person whose personal data is subject to Processing. In this case, Data Subjects may include customers, employees, contractors, suppliers, or third parties who have a direct or indirect legal, employment, commercial or contractual relationship with Distrito Obrador S.A.S.

3.7. Processing: Any operation or set of operations performed on personal data, including collection, storage, use, circulation or deletion.

3.8. Queries: A request for the Data Subject's personal information held in any database, for which Distrito Obrador S.A.S. is required to provide the Data Subject or their successors with all information contained in the individual record or associated with the identification of the Data Subject.

3.9. Complaint: A request for the correction, updating or deletion of information contained in a database processed by Distrito Obrador S.A.S., or a request concerning an alleged breach of any of the duties established under Law 1581 of 2012, submitted by the Data Subject or their successors.

3.10. Public Data: Data that is not classified as semi-private, private or sensitive. Public data includes, among others, information relating to a person's marital status, profession or occupation, and status as a merchant or public servant. By its nature, public data may be contained in public records, public documents, official gazettes and bulletins, and duly final judicial decisions that are not subject to confidentiality.

3.11. Sensitive Data: Personal data that reveals racial or ethnic origin, political opinions, religious or moral beliefs, trade union membership, health information or information concerning sexual life, or any other data that, by its nature or context, may result in discriminatory treatment of the Data Subject. Such data is subject to special protection.

3.12. Habeas Data: A fundamental right that allows individuals to know, update and rectify information stored about them in databases and files maintained by public and private entities.

3.13. Successor in Title: A person who has succeeded to or otherwise acquired, by any legal means, the rights of another person or persons.

4. GENERAL GUIDELINES

4.1. The policies contained in this document are mandatory for Distrito Obrador S.A.S., in its capacity as a source of information, as well as for Data Processors who process personal data on behalf of the Company.

4.2. Both the Data Controller and the Data Processors must safeguard databases containing personal data and maintain confidentiality regarding their Processing.

5. REGULATORY BACKGROUND

5.1 Article 15 of the Political Constitution
"All persons have the right to their personal and family privacy and to their good name, and the State must respect and ensure respect for these rights. Likewise, they have the right to know, update and rectify information collected about them in databases and files of public and private entities. In the collection, processing and circulation of data, freedom and the other guarantees established in the Constitution shall be respected."

5.2 Article 20 of the Political Constitution
"Every person is guaranteed the freedom to express and disseminate their thoughts and opinions, to provide and receive truthful and impartial information, and to establish mass media. These are free and have social responsibility. The right to rectification under conditions of equality is guaranteed. There shall be no censorship."

6. DISTRITO OBRADOR S.A.S. UNDER THE APPLICABLE REGULATIONS

We are a source of information.

6.1 WHY ARE WE A SOURCE OF INFORMATION?

Since Distrito Obrador S.A.S. is a company that collects credit information from users to whom services are offered through credit and cash payment methods, it constitutes one of the sources of information referred to in Article 3(b) of Law 1266 of 2008.

"A person, entity or organization that receives or becomes aware of personal data of Data Subjects by virtue of a commercial or service relationship or any other type of relationship and that, pursuant to legal authorization or authorization from the Data Subject, provides such data to an information operator, which in turn delivers it to the end user. If the source provides the information directly to users rather than through an operator, it shall have the dual status of source and operator and shall assume the duties and responsibilities of both. The source of the information is responsible for the quality of the data supplied to the operator and, insofar as it accesses and supplies personal information belonging to third parties, shall comply with the duties and responsibilities established to guarantee the protection of the rights of the Data Subject."

6.2 DUTIES OF INFORMATION SOURCES – ARTICLE 8, LAW 1266 OF 2008

Information sources shall comply with the following obligations, without prejudice to compliance with the other provisions established in this law and other regulations governing their activities:

a. Ensure that information supplied to database operators or users is truthful, complete, accurate, up-to-date and verifiable.
b. Periodically and promptly report to the operator all updates concerning data previously supplied and adopt the necessary measures to ensure that the information provided remains up to date.
c. Correct inaccurate information and notify the operators accordingly.
d. Design and implement effective mechanisms for promptly reporting information to the operator.
e. Where applicable, request and retain a copy or evidence of the authorization granted by the Data Subjects, and ensure that no data is supplied to operators without prior authorization when such authorization is required under this law.
f. Certify to the operator every six months that the information supplied has the required authorization under this law.
g. Resolve Data Subjects' complaints and requests in accordance with this law.
h. Inform the operator that certain information is under dispute by the Data Subject when a request for correction or updating has been submitted, so that the operator may include a corresponding notice in the database until the process has been completed.
i. Comply with the instructions issued by the supervisory authority regarding compliance with this law.
j. Fulfill any other obligations arising from the Constitution or this law.

6.3 PROCEDURE IN CASE OF IDENTITY THEFT OR FRAUD

In accordance with Law 2573 of 2026 and any regulations that amend, supplement or replace it, Distrito Obrador S.A.S. is committed to protecting the information of Data Subjects and preventing fraudulent activities.

If a Data Subject believes that a reservation, service or transaction carried out in their name was performed without their authorization or as a result of possible identity theft or fraud, they may submit a complaint through the customer service channels provided by Distrito Obrador S.A.S.

Once the request has been received, within ten (10) business days, Distrito Obrador S.A.S. shall review the information and supporting documents related to the disputed transaction, including identification documents, authorizations granted by the Data Subject, reservation records, payment receipts, electronic communications and any other available evidence, in order to verify the reported facts.

While the review is being conducted, and where appropriate under applicable regulations, Distrito Obrador S.A.S. shall inform the information operators that the data subject to the complaint is being disputed by the Data Subject.

If the review determines that identity theft or fraud occurred within the meaning of Article 3 of Law 2573 of 2026, Distrito Obrador S.A.S. shall adopt the necessary measures to correct, update or delete the corresponding information and shall promptly notify the information operators where necessary.

Distrito Obrador S.A.S. shall retain the supporting documents and evidence of transactions carried out by Data Subjects in order to ensure information security, address complaints and comply with applicable legal obligations.

7. PROCESSING OF PERSONAL DATA

7.1 Principles for the Processing of Personal Data
The following principles shall be taken into consideration by Distrito Obrador S.A.S. in the administration of personal data.

7.1.1 Lawfulness of Data Processing
The Processing of data must comply with the provisions of Law 1581 of 2012 and any regulation that develops or regulates such provisions.

7.1.2 Purpose and Processing
Personal data collected by Distrito Obrador S.A.S. may be used for the development of its corporate purpose and, in particular, to manage reservations, registration and identity verification processes (check-in and check-out), accommodation, customer service, provision of hotel, tourism and complementary services, payment administration, billing, collection, accounts receivable management, as well as consultation and reporting to information operators where appropriate in accordance with applicable regulations.

Personal data may also be processed to prevent, detect, investigate and report conduct that may constitute illegal or fraudulent activities, including fraud, identity theft, money laundering, terrorist financing, human trafficking, sexual exploitation, commercial sexual exploitation of children and adolescents (ESCNNA), sex tourism, child pornography and any other conduct that may jeopardize the integrity, safety or rights of guests, visitors, employees or third parties.

Personal data may also be used to address requests, complaints and claims; comply with legal, regulatory, contractual and tax obligations; respond to requests from administrative, judicial, police, immigration or other competent authorities; comply with obligations relating to immigration control, public safety and guest registration; and, in general, comply with any obligations applicable to providers of hotel and tourism services.

Likewise, information may be used to manage the security of the Company's facilities, control access, protect persons and property located therein, address security incidents and conduct internal investigations where necessary.

Personal data may also be processed for the administration of loyalty programs, sending commercial communications, marketing and advertising activities, promotions, satisfaction surveys, preparation of statistics and reports, customer knowledge, commercial profiling, improvement of the guest experience and development of new products, services or benefits.

The Data Subject expressly authorizes Distrito Obrador S.A.S. to carry out the national and/or international transmission and/or transfer of their personal data to commercial partners, affiliated companies, contractors and, in general, to any Data Processor or Data Controller that requires access to the information for the purposes described herein or to comply with legal or contractual obligations. Such transmissions or transfers may be made to countries other than Colombia, including jurisdictions that may or may not have adequate levels of personal data protection, in which case Distrito Obrador S.A.S. shall adopt reasonable measures to ensure the protection, confidentiality and security of the information.

Finally, Distrito Obrador S.A.S.'s website may use cookies, analytics tools, tracking technologies, online identifiers and similar mechanisms for technical, functional, statistical, analytical, security, personalization, marketing and advertising purposes. These technologies allow, among other things, the proper functioning of the website, the storage of browsing preferences, analysis of user behavior, measurement of advertising campaign performance and improvement of the browsing experience. The processing of information collected through such technologies shall be carried out in accordance with Distrito Obrador S.A.S.'s Cookie Policy, available for consultation at https://obrahotels.com/.

7.1.3 Accuracy or Quality
Information subject to Processing must be truthful, complete, accurate, up-to-date, verifiable and understandable. The Processing of partial, incomplete, fragmented or misleading data is prohibited.

7.1.4 Transparency
Data Processing must guarantee the Data Subject's right to obtain from Distrito Obrador S.A.S. or the Data Processor, at any time and without restrictions, information regarding the existence of data concerning them.

7.1.5 Restricted Access and Circulation

Processing shall be subject to the limits arising from the nature of personal data, the provisions of Law 1581 of 2012 and the Constitution. Accordingly, Processing may only be carried out by persons authorized by the Data Subject and/or by persons authorized under the law.

Personal data, except for public information, may not be made available on the Internet or through other means of mass dissemination or communication, unless access can be technically controlled in order to restrict access exclusively to Data Subjects or third parties authorized under the law.

7.1.6 Security
Information subject to Processing by the Data Controller or Data Processor shall be handled using reasonable technical, human and administrative measures to provide security to the records and prevent their alteration, loss, consultation, use or unauthorized or fraudulent access.

7.1.7 Confidentiality
All persons involved in the Processing of personal data that is not public in nature are required to maintain the confidentiality of the information, including after their relationship with any of the activities comprising such procedure has ended. Personal data may only be supplied or communicated when this corresponds to activities authorized by law and under the terms established therein.

7.2 SPECIAL CATEGORIES OF DATA

7.2.1 Sensitive Data
In accordance with Law 1581 of 2012 and Decree 1377 of 2013, Distrito Obrador S.A.S. informs the Data Subject that providing sensitive data is optional and that the Data Subject is not required to authorize its Processing.

In particular, Distrito Obrador S.A.S. may collect and process biometric data such as facial images, facial recognition, fingerprints, voice recordings or other authentication or identification mechanisms when used for registration processes, identity validation, access control, fraud prevention, asset protection, facility security or responding to requests from competent authorities.

In general, Distrito Obrador S.A.S. may process sensitive personal data when necessary for the provision of its services, the protection of guests, visitors and employees, or compliance with legal or regulatory obligations.

Distrito Obrador S.A.S. shall adopt the technical, human and administrative measures necessary to protect sensitive data under its custody and guarantee its confidentiality, integrity and security, in accordance with applicable personal data protection regulations.

7.2.1.2 Video Surveillance
Distrito Obrador S.A.S. may use video surveillance systems and other monitoring mechanisms at its facilities in order to ensure the safety of guests, visitors, employees, contractors and third parties; protect the Company's property and facilities; control access to restricted areas; prevent unlawful conduct; address security incidents; and comply with requests from competent authorities.

Images, photographs, video recordings and other records obtained through these systems may be stored, accessed and used for the purposes described herein, and may be provided to administrative, judicial or police authorities when there is a legal obligation or a request from a competent authority.

Distrito Obrador S.A.S. shall adopt reasonable security measures to protect information obtained through video surveillance systems and limit access exclusively to authorized personnel or third parties legally entitled to access such information.

7.2.1.2 Distrito Obrador S.A.S. shall only process sensitive personal data when it has the prior, express and informed authorization of the Data Subject or when such Processing is permitted under one of the exceptions established in Law 1581 of 2012 and any other regulations that amend, supplement or replace it.

7.2.2 Rights of Children and Adolescents
Processing shall ensure respect for the prevailing rights of children and adolescents. The Processing of personal data belonging to children and adolescents is prohibited, except for data that is public in nature.

7.2.3 Rights of Data Subjects

7.2.3.1 To know, update and rectify their personal data held by Distrito Obrador S.A.S. or by the designated Data Processor. This right may be exercised, among other circumstances, in relation to partial, inaccurate, incomplete, fragmented or misleading data, or data whose Processing is expressly prohibited or has not been authorized.

7.2.3.2 To request proof of the authorization granted to Distrito Obrador S.A.S., except where authorization is expressly excluded as a requirement for Processing in accordance with Article 10 of Law 1581 of 2012.

7.2.3.3 To be informed by Distrito Obrador S.A.S. or the designated Data Processor, upon request, regarding the use made of their personal data.

7.2.3.4 To file complaints with the Superintendence of Industry and Commerce regarding violations of Law 1581 of 2012 and any other regulations that amend, add to or supplement it.

7.2.3.5 To revoke authorization and/or request the deletion of data when the principles, rights and constitutional and legal guarantees are not respected in the Processing. Revocation and/or deletion shall apply when the Superintendence of Industry and Commerce has determined that Distrito Obrador S.A.S. or the designated Data Processor has engaged in conduct contrary to Law 1581 of 2012 and the Constitution.

7.2.3.6 To access, free of charge and under the conditions established in this document, their personal data that has been subject to Processing.

8. CONDITIONS FOR THE PROCESSING OF DATA

8.1 Authorization
In accordance with the principles of purpose and freedom, the collection of data by Distrito Obrador S.A.S. shall be limited to personal data that is relevant and appropriate for the purpose for which it is collected or required under applicable regulations, except in cases expressly provided for by law.

8.2 Authorization from the Data Subject
For Distrito Obrador S.A.S. to carry out any Processing of personal data, prior and informed authorization from the Data Subject is required. Such authorization must be obtained by any means that allows it to be subsequently consulted. These mechanisms may be predetermined through technical means that facilitate the Data Subject's automated expression of consent or may be provided in writing or orally.

Distrito Obrador S.A.S. requests authorization to process information from all Data Subjects whenever such collection involves the Processing of information by Distrito Obrador S.A.S. or third parties (with prior authorization). This authorization is requested when commercial relationships are established with customers (credit and cash sales), when products and services are purchased from suppliers, and when personnel are hired to perform activities inherent to the organization.

Distrito Obrador S.A.S. has adopted procedures to request, no later than at the time of data collection, the Data Subject's authorization to process such data and shall inform the Data Subject of the personal data to be collected and all specific purposes for which such consent is obtained.

Personal data found in publicly accessible sources, regardless of the means through which it is accessed, may be processed by Distrito Obrador S.A.S., provided that, by its nature, such data is public.

In the event of substantial changes to the content of the Data Processing Policies concerning the identification of the Data Controller and the purpose of data Processing, which may affect the content of the authorization, Distrito Obrador S.A.S. shall communicate such changes to Data Subjects at least three days before the new policy comes into force and shall obtain a new authorization from the Data Subject when the change relates to the purpose of Processing.

8.2.1 Cases in Which Authorization Is Not Required
a. Information requested by a public or administrative entity in the exercise of its legal functions or pursuant to a court order.
b. public data.
c. Medical or health emergencies.
d. Processing of information authorized by law for historical, statistical or scientific purposes.
e. Data relating to the Civil Registry of persons.

8.3 Provision of Information Information requested by the Data Subject shall be provided by Distrito Obrador S.A.S. and may be supplied through any means, including electronic means, as requested by the Data Subject. The information shall be easy to read, without technical barriers preventing access, and shall correspond fully to the information contained in the database.

8.4 Duty to Inform the Data Subject When requesting authorization from the Data Subject, Distrito Obrador S.A.S. shall clearly and expressly inform the Data Subject of the following: The Processing to which their personal data will be subject and the purpose thereof. The optional nature of answering questions concerning sensitive data or data belonging to children and adolescents. The rights they have as Data Subjects. The identification, physical or electronic address and telephone number of the Data Controller.

8.5 Persons to Whom Information May Be Provided: Information concerning personal data that has been processed by Distrito Obrador S.A.S. may be provided to: Data Subjects, their successors in title or legal representatives. Public or administrative entities in the exercise of their legal functions or pursuant to a court order. Third parties authorized by the Data Subject or by law.

9. RIGHTS OF THE DATA SUBJECT

9.1 Revocation of Authorization and/or Deletion of Data
Data Subjects may at any time request Distrito Obrador S.A.S. to delete their personal data and/or revoke the authorization granted for its Processing by submitting a complaint in accordance with Article 15 of Law 1581 of 2012.The request for deletion of information and revocation of authorization SHALL NOT APPLY WHEN THE DATA SUBJECT HAS A LEGAL OR CONTRACTUAL OBLIGATION TO REMAIN IN THE DATABASE OF DISTRITO OBRADOR S.A.S. The procedure established in this document for submitting complaints shall apply.

9.2 Queries and Complaints:
The Data Subject or their successors in title have the right to submit queries and/or complaints to Distrito Obrador S.A.S., subject to prior identity verification, through any of the customer service mechanisms provided by the Company nationwide. Distrito Obrador S.A.S. shall respond to the query and/or complaint through the same means through which it was submitted.

9.2.1 Query
Data Subjects or their successors in title may consult the Data Subject's personal information held in the database of Distrito Obrador S.A.S. The Company shall provide the applicant with all information contained in the individual record or associated with the identification of the Data Subject.

The Data Subject may consult their personal data free of charge:
At least once (1) per calendar month. Whenever substantial modifications are made to the Information Processing Policies that give rise to new consultations. For consultations made more frequently than once per calendar month, Distrito Obrador S.A.S. shall only charge the costs of delivery, reproduction and, where applicable, certification of documents. Reproduction costs may not exceed the cost of recovering the corresponding materials.

Response to Queries
For purposes of responding to queries, Distrito Obrador S.A.S. has a period of ten (10) business days from the date of receipt. When it is not possible to respond within this period, the interested party shall be informed of the reasons for the delay and the date on which the query will be answered, which in no case may exceed five (5) business days following the expiration of the initial period.

Complaints
The Data Subject or their successors in title who believe that information contained in a database should be corrected, updated or deleted, or who identify an alleged breach of any of the duties established under Law 1581 of 2012, may submit a complaint to Distrito Obrador S.A.S. The complaint shall be processed under the following rules and shall be submitted through a request addressed to Distrito Obrador S.A.S. containing, at a minimum, the following information:

Name of the Data Controller or Data Processor.
Name of the applicant.
Identification number of the applicant.
Facts supporting the request.
Purpose of the request.
Address for correspondence.
Documents intended to support the request.
If the complaint is incomplete, the interested party shall be requested, within five (5) days following receipt of the complaint, to correct the deficiencies. If two (2) months elapse from the date of such request without the applicant providing the required information, the complaint shall be deemed withdrawn. If the person receiving the complaint is not competent to resolve it, they shall transfer it to the appropriate party within a maximum period of two (2) business days and inform the interested party of the situation. Once the complaint is complete, a notice stating "complaint under review" and the reason for the complaint shall be included in the database within no more than two (2) business days. Such notice shall remain until the complaint is resolved. The maximum period for resolving the complaint shall be fifteen (15) business days from the day following its receipt. When it is not possible to resolve the complaint within this period, the interested party shall be informed of the reasons for the delay and the date on which the complaint will be resolved, which in no case may exceed eight (8) business days following the expiration of the initial period.

9.2.3 Procedural Requirement: The Data Subject or successor in title may only file a complaint with the Superintendence of Industry and Commerce after having exhausted the query or complaint procedure before the Data Controller or Data Processor.

9.2.4 Procedure for Queries and Complaints
In accordance with the foregoing, Distrito Obrador S.A.S. shall respond to the query and/or complaint through the same means through which it was submitted.

The procedure established by Distrito Obrador S.A.S. for submitting complaints, making queries and/or exercising rights as a Data Subject is as follows:

9.2.4.1 Receipt of the complaint or query at any of the Company's facilities. These may be identified through the website https://obrahotels.com/. Requests may also be submitted directly in writing to the administrative offices located at Calle 9 # 43C-41, Astorga Neighborhood, Medellín, Antioquia, Colombia.

9.2.4.2 Complaints or queries may also be submitted by email at: gerencia@obrahotels.com

9.2.4.3 For requests or queries, there is a period of ten (10) business days from receipt. Where necessary, the response may be extended by an additional five (5) business days.

9.2.4.4 For complaints, there is a period of fifteen (15) business days to resolve them, pursuant to paragraph three of Article 16 of Law 1266 of 2008.

9.2.4.5 Exceptionally, an additional eight (8) business days may be granted following the initial fifteen (15) business days to respond to the petition, provided that the person submitting the petition is notified.

9.2.4.6 Within two (2) business days following receipt of the complaint, Distrito Obrador S.A.S. shall enter into the operator's database a record or notice stating that a "complaint is under review."

9.2.4.7 If the Company is not competent to resolve the matter, it shall have two (2) business days to transfer the information to the competent entity.

9.2.4.8 Once a response to the query or complaint submitted by the Data Subject is available, it shall be sent to the address provided in the request and/or through the means by which the query was submitted.

9.2.4.9 In case of questions or concerns regarding the procedure for submitting complaints, making queries and/or exercising rights as a Data Subject concerning information collected by Distrito Obrador S.A.S., general information may be requested from the Customer Service Department by email at gerencia@obrahotels.com.

10. DUTIES OF DISTRITO OBRADOR S.A.S. IN THE PROCESSING OF DATA
a. Guarantee the Data Subject, at all times, the full and effective exercise of the right of habeas data.
b. Request and retain, under the conditions established by law, a copy of the corresponding authorization granted by the Data Subject.
c. Properly inform the Data Subject of the purpose of data collection and the rights arising from the authorization granted.
d. Adopt measures aimed at maintaining information under appropriate security conditions to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access.
e. Ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable.
f. Update information by promptly communicating to the Data Processor all changes concerning data previously supplied and adopting the necessary measures to ensure that the information remains up to date.
g. Correct inaccurate information and communicate the relevant information to the Data Processor.
h. Provide the Data Processor, as applicable, only with data whose Processing has been previously authorized in accordance with the law.
i. Require the Data Processor at all times to respect the security and privacy conditions applicable to the Data Subject's information.
j. Process queries and complaints within the terms established by law.
k. Adopt an internal policy and procedure manual to ensure proper compliance with this law and, in particular, to address queries and complaints.
l. Inform the Data Processor when certain information is being disputed by the Data Subject once a complaint has been submitted and the corresponding procedure has not yet been completed.
m. Inform the Data Subject, upon request, of the use made of their data.
n. Inform the data protection authority when security code breaches occur and there are risks associated with the administration of Data Subjects' information.
o. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

10.1 Duties of the Data Processor
Data Processors shall comply with the following duties, without prejudice to the other provisions established by law and other regulations governing their activities:
a. Guarantee the Data Subject, at all times, the full and effective exercise of the right of habeas data.
b. Adopt measures to maintain information under the security conditions necessary to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access.
c. Timely carry out the updating, correction or deletion of data in accordance with this law.
d. Update the information reported by Data Controllers within five (5) business days from receipt thereof.
e. Process queries and complaints submitted by Data Subjects within the terms established by law.
f. Adopt a document ensuring proper compliance with the law and, in particular, addressing queries and complaints submitted by Data Subjects.
g. Record in the database the notice "complaint under review" in accordance with the law.
h. Insert in the database the notice "information under judicial dispute" once notified by the competent authority of judicial proceedings concerning 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 information only to persons 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. Safeguard databases containing personal data.
n. Maintain confidentiality regarding the Processing of personal data.

11. SECURITY MEASURES
Distrito Obrador S.A.S. takes all reasonable precautions and technical, administrative and organizational measures necessary to guarantee the security of Data Subjects' personal data, particularly measures intended to prevent its alteration, loss and unauthorized Processing or access.
Security measures apply both to files and to Processing activities. The implementation of security measures is intended to ensure the preservation, confidentiality, integrity and availability of the data.

12. MODIFICATIONS
Distrito Obrador S.A.S. reserves the right to modify these Information Processing Policies, either in whole or in part. In the event of substantial changes to the Processing Policies concerning the identification of Distrito Obrador S.A.S. and the purpose of the Processing of personal data, which may affect the content of the authorization, Distrito Obrador S.A.S. shall communicate such changes to the Data Subject no later than when the new policies are implemented.