

PERSONAL DATA PROTECTION TREATMENT POLICY – C.I. JEANS S.A.S.

In compliance with provisions of Statutory Law 1581 of 2012, especially the provisions of its 9 and 12, its Regulatory Decree 1377 of 2013 and the other relevant regulations, C.I. JEANS S.A.S., identified with NIT 800.206.584-7, informs the policy of this company, as responsible for the processing of personal data, for the treatment and protection thereof.

I. IDENTIFICATION OF THE RESPONSIBLE PERSON

- NAME OF THE RESPONSIBLE: C.I. JEANS S.A.S.
- ADDRESS: CRA. 53 N° 77 SUR – 120
- EMAIL: dmoreno@cijeans.com.co
- RESPONSIBLE'S PHONE: +57 (604) 309-98-98

II. TREATMENT AND PURPOSE

The C.I. JEANS S.A.S., subject to the constitutional and legal provisions, will be governed in its role as responsible for the processing of personal data by the guiding principles that in this matter has been provided by the Colombian legal system, there are, according to Article 4 of Law 1581 of 2012:

- **PRINCIPLE OF LEGALITY REGARDING DATA PROCESSING:** C.I. JEANS S.A.S. will administer its databases for which it is responsible with total submission to the constitutional and legal postulates that regulate the matter.
- **PRINCIPLE OF PURPOSE:** The purpose for which personal data is managed and processed will be completely in accordance with the law; the will be legitimately used for the development of the commercial, operational and / or administrative activities of the company.
- **PRINCIPLE OF FREEDOM:** C.I. JEANS S.A.S. will treat only those data of which you have consent or those that without the consent the law allows them for their treatment.
- **PRINCIPLE OF VERACITY OF QUALITY:** The storage and treatment of truthful, current and accurate information will be constantly monitored; likewise, permanent measures will be implemented that favor the updating of the data that is stored, ensuring that no partial, incomplete, or error-induced data is processed, which is expressly prohibited by law.
- **PRINCIPLE OF TRANSPARENCY:** C.I. JEANS S.A.S. it will have a communication mechanism where the owners of the data may go at any time with the aim of obtaining information on the personal data that are subject to processing by this company and exercise the rights that assist them according to Article 15 of the Political Constitution of Colombia (Right to Habeas Data).
- **PRINCIPLE OF ACCESS AND RESTRICTED CIRCULATION:** Control and restriction of stored data is guaranteed, especially those data that by their nature require special treatment (sensitive data of children and adolescents), so that only those who have the proper authorization will have access to them.
- **SECURITY PRINCIPLE:** The necessary and adequate measures will be taken for the protection of stored data not only by C.I. Jeans S.A.S. as responsible for the data processing but also by any person in charge of the processing of the same.
- **PRINCIPLE OF CONFIDENTIALITY:** C.I. JEANS S.A.S. It will guarantee the confidentiality of the information stored and will make the supply or communication of the same only when it corresponds to the development of the activities authorized by law.

To that extent, C.I. JEANS S.A.S. It will only process the data stored for the exercise and development of activities of its corporate purpose and the administrative development of the company, especially for billing purposes, to comply with the tax requirements when making a sale, to contact the company with the own and exclusive purpose of the contractual and commercial relationship that have been initiated between the parties when the relationship begins with a legal person, to corroborate the references and reputation of who is linked through this form in case of sales to deadlines, to perform customer behavior analysis processes in order to define consumption habits with the aim of improving the costumer experience with C.I. JEANS S.A.S. brands; have a record of active and inactive customers; contact clients or future clients through different channels (email, physical mail, through call center, etc.) for collection or legal purpose if necessary; receive, respond to and resolve requests, complaints, claims and / or suggestions presented by current or future clients; carry out academic activities in association with public or private entities in the marketing area. For which, eventually and only for the purposes described, you can share the information with companies such as Compretex in addition to those companies that will act as processors and will process the C.I. JEANS S.A.S. under the parameters that the law imposes.

LII. RIGHT THAT ASSIST DATA HOLDERS

In full development of the provisions od article 15 of the Political Constitution of Colombia and its rights:

- **RIGHT TO KNOW:** The owner of the data is assisted by the Right to know what personal data of his are in charge of those responsible and / or in charge of data processing.
- **RIGHT TO UPDATE:** The owner of the data is assisted by the Right to permanently update the data that is processed by the person in charge and / or in charge of data processing in order that they are adjusted to reality and allow for optimum quality of the information.
- **RIGHT TO RECTIFY:** The owner of the data is assisted by the Right to Rectify the personal data that the person responsible and / or in charge of the treatment is trying to find it wrong.
- **RIGHT TO DELETE:** The owner of the data is assisted by the Right to unsubscribe from the databases processed by the person responsible and / or responsible for the data at any time.
- **RIGHT TO REVOKE THE AUTHORIZATION:** The holder of the personal data is assisted by the Right to revoke the authorization that was initially granted for the processing of the data by the person in charge. This revocation can be total or partial according to the owner so they want, and provided that such situation is reported in a timely manner.

The owner of the personal data will have to power to decide whether or not to answer the question that are asked when they deal with sensitive data (data of girls, boys and adolescents), as provided in paragraph “b” of article 12 of the Law 1581.

In no case will the personal data that, upon request, not have the prior, express and informed consent of the owner under article 9 of Law 1581 be processed.

IV. RESPONSIBLE PERSON AND PROCEDURE FOR THE CARE OF CONSULTATION, PETITIONS AND CLAIMS

C.I. JEANS S.A.S., in order to establish a permanent channel of communication with the owner of the data, thus facilitating timely and permanent attention to their queries, requests and claims, has provided that whoever wants to exercise their right to know, rectify, delete or revoke authorization, can communicate clearly expressing the intention of his / her email dmoreno@cijeans.com.co addressed to Diego Moreno Londoño

Once the mail has been received by the official of C.I. JEANS S.A.S., this company will have a term of 15 days to respond to it by the same means.

V. VALIDITY OF THE DATABASE

This policy will be effective as of October 19, 2016 and any substantial modification to it will be informed in a timely manner through the appropriate means available for such purposes.



Diego Alonso Moreno Londoño
Legal Representative