

	<p align="center"><b>PRIVACY POLICY</b></p> <p align="center"><b>CELESTE Y PIEDRA SAS.</b></p>	<p>Fecha de aprobación: 16/08/2023. Para uso de página Web.</p>
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#### PERSONAL DATA PROCESSING POLICY CELESTE Y PIEDRA SAS.

In order to comply with current legislation on data protection, especially Law 1581 of 2012 (and other regulations that modify, add, complement or develop it) and Decree 1377 of 2013, we put it below both of the relevant aspects in relation to the collection, use and transfer of personal data that CELESTE Y PIEDRA S.A.S (hereinafter the "Company" or C&P) performs your personal data, by virtue of the authorization granted by you to advance said treatment, as well as the management of your data.

In this personal data processing policy (the "Policy") you will find the corporate and legal guidelines under which the Company processes your data, the purpose, your rights as the owner, as well as the internal and external procedures for the exercise of rights stories.

In accordance with the provisions of article 15 of the Political Constitution of Colombia and the applicable legislation (Law 1266 of 2008, Law 1581 of 2012, Decree 1377 of 2013 and all those regulations that regulate, add, repeal or modify), we have a clear privacy policy and protection of your personal data: we do not obtain personal information from third parties that have a commercial or legal relationship with the Company, including you, Employees or Suppliers, unless they have provided it voluntarily with your prior consent, express and qualified.


#### Identification of the data controller:

- Company name: Celeste y Piedra S.A.S.
- NIT: 900076013-7
- Telephone: +57 322 2239933
- Email: contacto@celestey piedra.com

#### Definitions

For the interpretation of this Policy, we ask you to take into account the following definitions:

- Personal data: Any information linked or that can be associated to one or several specific or determinable natural persons;
- Sensitive data: Those data that affect the privacy of the Owner or whose improper use may generate discrimination, such as: data on racial origin, religious convictions, membership in political or union organizations, health and sex life, and biometric data.
- Processor: Natural or legal person, public or private, that by itself or in association with others, performs the Processing of personal data on behalf of the Company as data controller;
- Treatment Policy: Refers to this document, as a personal data treatment policy applied by the Company in accordance with the guidelines of current legislation on the matter;

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- **Supplier:** Any natural or legal person that provides a service to the Company by virtue of a contractual/obligational relationship;
- **Responsible for the Treatment:** Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the Treatment of the data, for the purposes of this policy, will act as the person in charge, in beginning, the Company;
- **Holder:** Natural person whose personal data is subject to Treatment, be it a client, supplier, employee, or any third party that, due to a commercial or legal relationship, provides personal data to the Company;
- **Transfer:** Refers to the sending by the Company as responsible for the Treatment or a Data Manager, to a third agent or natural/legal person (receiver), inside or outside the national territory for the effective treatment of personal data;
- **Transmission:** refers to the communication of personal data by the person in charge to the Manager, located inside or outside the national territory, so that the Manager, on behalf of the person in charge, processes personal data;
- **Treatment:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- For the understanding of the terms that are not included in the previous list, you must refer to the current legislation, especially Law 1581 of 2012 and Decree 1377 of 2013, giving the meaning used in said regulation to the terms of whose definition there is any doubt. Use and purpose of the Treatment:

The Company recognizes that the Owner of the personal data has the right to have a reasonable expectation of their privacy, taking into account in any case their responsibilities, rights and obligations with the Company.

By virtue of the relationship established between you and the Company, they collect, store, use and transmit or transfer personal data to companies located inside and outside Colombia. Personal data is used for:

- Execution of the contract signed with the Company.
- Payment of contractual obligations.
- Sending information to government or judicial entities at their express request.
- Support in external/internal audit processes.
- Sending/Receiving messages for commercial, advertising and/or customer service purposes.
- Registration of Employee information in the Company's database.
- Registration of Supplier information in the Company's database.

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- Contact with Employees or Suppliers to send information related to the contractual, commercial and obligatory relationship that takes place.
- Collection of data for the fulfillment of the duties that as Responsible for the information and personal data, corresponds to the Company.
- For security or fraud prevention purposes.
- To provide you with effective customer service.
- Any other purpose that results in the development of the contract or the relationship between you and the Company. If you provide us with Personal Data, this information will be used only for the purposes indicated herein, and we will not proceed to sell, license, transmit or disclose it outside the Company unless (i) you expressly authorize us to do so, (ii) is necessary to enable our contractors or agents to perform the services we have entrusted to them, (iii) in order to provide you with our services, (iv) is disclosed to entities that perform marketing services on our behalf or to other entities with whom we have joint marketing agreements, (v) is in connection with a merger, consolidation, acquisition, divestiture or other restructuring process, or (vi) as required or permitted by law.


In order to implement the purposes described above, your personal data may be disclosed for the purposes set forth above to human resources personnel, managers, consultants, advisors, and other persons and offices as appropriate.

The Company may subcontract to third parties for the processing of certain functions or information. When we actually outsource the processing of your personal information to third parties or provide your personal information to third party service providers, we advise such third parties of the need to protect such personal information with appropriate security measures, in strict compliance with this policy, we prohibit the use of your personal information for their own purposes and we prevent them from disclosing your personal information to others.

In the same way, the Company may transfer or transmit (as appropriate) your personal data to other companies abroad for reasons of security, administrative efficiency and better service, in accordance with the authorizations of each of these persons. C&P has adopted the necessary measures so that these companies implement in their jurisdiction and in accordance with the laws applicable to them, security standards and protection of personal data even similar to those provided in this document and in general in the Company's policy on the matter. In the case of transmission of personal data, the transmission contract will be signed under the terms of Decree 1377 of 2013.

Additionally, we inform you that once the need to process your data ceases, they may be removed from the C&P databases or archived in secure terms so that they are only disclosed when appropriate in accordance with the law. Rights of the Owner:

In accordance with article 8 of Law 1581 of 2012, the rights that assist you as the owner in relation to your personal data are:

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- Know, update and rectify your personal data in front of C&P as the person in charge of the Treatment or in charge of the Treatment. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or those whose Treatment is expressly prohibited or has not been authorized;
- Request proof of the authorization granted to the Company as responsible for the Treatment except when expressly excepted as a requirement for the Treatment;
- To be informed by the Company, as responsible for the Treatment or by the Treatment Manager, upon request, regarding the use that has been given to your personal data;
- Submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of this law and other regulations that modify, add or complement it;
- Revoke the authorization and/or request the deletion of the data when the Treatment does not respect the constitutional and legal principles, rights and guarantees;
- Free access to your personal data that have been processed.

Within this policy you will find the procedure through which the Company guarantees the exercise of all your rights.

Area in charge of handling requests, queries or claims:

In order for the Holders to be able to exercise their rights to know, update, rectify and delete their Personal Data and revoke the Authorization, The Company has designated the Legal and Compliance Area, headed by the Compliance Officer, as responsible for meeting the different requirements (requests, queries and claims).


Procedures for the exercise of your rights as owner: To exercise their rights, the Owner, successor in title or their representative, may carry out the following procedures:

to. Queries: the Owner of the personal data, or whoever is duly authorized, may make requests and queries to know the personal information of the Owner that rests in a C&P database.

The term to attend to it will be ten (10) business days from the date of receipt of it. However, when it is not possible to attend to it within said term, C&P will inform the interested party of the date on which it will be attended, stating the reasons for the delay, which may not exceed five (5) business days following the expiration of the initial term.

b. Claims: the Owner of the personal data, or whoever is duly authorized, may file a claim in which they request the correction, update or deletion of their personal data. There will also be room for the formulation of claims when it is considered that there is an alleged breach of any of the duties that assist C&P established in Law 1581 of 2012 and when the Holder wishes to revoke the authorization for treatment.

The claim will be processed as long as it complies with the following rules:

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- The interested party must fully identify himself, indicating full names and surnames, telephone number, physical address and email to receive notifications. Likewise, you must identify the facts that give rise to the claim and the documents that you want to assert.
- If the interested party provides the aforementioned information in an incomplete or confusing manner, The Company may ask them to complete the information, via email within a period not exceeding 5 days following receipt of the complaint or claim, thus suspending the term. that C&P has to answer. Once the interested party provides or clarifies the information, said term will resume. knowledge to the responsible area within the Company, depending on which of them your request is directed to, the query, request or complaint will be processed.

**Modification of this Policy:**

This policy can be modified at any time, which is why we recommend you review it regularly or periodically on our website [www.celesteypiedra.com](http://www.celesteypiedra.com), or through the intranet where you will be notified of the change and the latest information will be made available to you. version of this Policy or the mechanisms to obtain a copy of it.

Effective date: August 16, 2023.

**Terms and conditions Website:**

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Welcome to the Celeste y Piedra SAS website.

By entering, reviewing this website you agree to read, inform yourself and comply with the terms and conditions of use, in addition, you have the obligation to respect the privacy policies. The content, Service and offers that you find on this website apply to Colombia and foreign countries. Celeste y Piedra S.A.S may make changes at any time to the terms and conditions described herein. The modifications made in the terms and conditions begin to be valid from the moment they appear published.

#### Customer Service Contact Information:

In compliance with Law 1480 of 2011, CELESTE Y PIEDRA S.A.S informs that we are a company incorporated under the Republic of Colombia, with a tax identification number – NIT. 900076013-7, with address in the city of Santa Marta, judicial notification address Telephone: +57 322 2239933 and email for online customer service [contacto@celesteypiedra.com](mailto:contacto@celesteypiedra.com)

#### Purpose:

The web page is designed for the presentation to the consumer of the services provided by Celeste y Piedra S.A.S in its offices and that may also be acquired by the consumer by this electronic means. Additionally, blogs, information and events related to Celeste y Piedra S.A.S are presented. This web page may be used to review and consult the services that Celeste y Piedra S.A.S makes available to its users and consumers.

#### Industrial and intellectual property rights:

The information (documents, images, videos, tools, graphics, brands, names, logos and other material found on this website) are protected in accordance with the provisions of Colombian and international legislation on copyright, intellectual property and industry; therefore, its use is exclusively limited to personal review, contracting and consultation purposes.


Thus, the publication of the contents found on this website does NOT grant the consumer any kind of license to use the brand, copyright or intellectual property to whoever visits, consults or contracts the services provided by C&P through from this website.

#### consumer information

As a consumer, you must have full legal capacity to be bound and contract the services provided by Celeste y Piedra S.A.S. In any case, we will only allow people of legal age, duly identified with a citizenship or foreigner identification card, to register and carry out consultation and service contracting operations through this page.

#### Registration and personal data.

To make online payments you will need to register on the website. For this purpose, personal and confidential information is required. This information will be for the exclusive use of Celeste y Piedra S.A.S. In accordance with the provisions of Statutory Law 1581 of 2012, on the protection of

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personal data, Celeste y Piedra S.A.S undertakes to keep the confidentiality and security of the information that users deposit on our website. The registration, password and username of each of our consumers will be for their exclusive use and may not be transferred to third parties. The data referred to in these terms and conditions will have the purpose of validating, improving the work of information and commercialization of the services provided by Celeste y Piedra S.A.S.

Contractual provisions:

Celeste y Piedra S.A.S provides the service of:

Structuring and project design.

Architectural design and management for building construction license.

Urban design and management for urban planning licences.

Design for public space projects + landscaping.

Urban design for master plans in rural areas.

Coordination and integration of engineering + budgets + specifications.

taking due care to guarantee the security of the information and transactions carried out, however, we cannot be held responsible for delays in the operation or transmission, technological errors, manipulation by unauthorized third parties or any event of invasion or technological manipulation in the operation of the website. Consequently, any transaction made by the consumer must be subject to confirmation by both the consumer and Celeste y Piedra S.A.S, and it may be canceled when any of the situations described above occurs.

Consumer Rights:

You will enjoy all the rights recognized by Colombian legislation on Consumer Protection and Personal Data Protection, for this reason, you can file your requests, complaints, claims and suggestions (PQR) through the following email: [contacto@celestey piedra.com](mailto:contacto@celestey piedra.com). Likewise, you can present them in person at our main address.

Consumer Duties:

All those contemplated in article 3 of Law 1480 of 2011, which are related to the services provided by Celeste y Piedra SAS.

Additionally, the client must:

- Carefully analyze the information provided in advertising messages
- Celebrate transactions of goods and services within the legally established trade.
- Read and comply with all the duties, terms, conditions and policies that are communicated through our website.

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