

PRIVACY POLICY

For KfW IPEX-Bank GmbH (“**KfW IPEX-Bank**”) as a data controller, the protection of personal data of its business partners, customers, employees, and other natural persons with whom in connection with have great importance.

KfW IPEX-Bank is located in Palmengartenstrasse 5-9, 60325 Frankfurt am Main, Germany (Phone: +49 69 74 31-3300, Fax: +49 69 74 31-8536). KfW IPEX-Bank’s Representative Office (“**Representative Office**”) domiciled at Carrera 7 No 71-21, Torre B Oficina 404, in the city of Bogotá – DC (Colombia), serves to initiate financing transactions in compliance with the Colombian Data Protection Act.

KfW IPEX-Bank, in accordance with the provisions of the current legislation on Habeas Data and Personal Data Protection, specifically Statutory Law 1581 of 2012 and Decree 1377 of 2013, hereby informs the Data Subjects of its Privacy Policy.

This policy explains how your personal data is processed, the purposes for which it is processed and your rights as a data subject.

1) Definitions

- a) **Authorization:** Prior, express, and informed consent of the data subject to carry out the processing of personal data.
- b) **Database:** An organized set of personal data that is subject to processing.
- c) **Personal Data:** Any piece of information linked to one or more identified or identifiable individuals or that can be associated with a natural or legal person.
- d) **Sensitive Data:** Data that affects the privacy of the data subject or whose misuse can lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social organizations, human rights organizations, or those promoting the interests of any political party or guaranteeing the rights of opposition political parties, as well as data related to health, sexual life, and biometric data.
- e) **Data Processor:** A natural or legal person, public or private, who, alone or in association with others, processes personal data on behalf of the data controller.
- f) **Data Controller:** A natural or legal person, public or private, who, alone or in association with others, decides on the database and/or the processing of the data.
- g) **Data Subject:** A natural person whose personal data is subject to processing.
- h) **Transfer:** Occurs when the data controller and/or data processor, located in Colombia, sends personal information to a recipient who, in turn, is responsible for the processing and is located within or outside the country.
- i) **Transmission:** The processing of personal data that involves the sending of such data within or outside the Colombian territory when the purpose is to carry out processing by the processor on behalf of the controller.
- j) **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.

2) Processing

The personal data collected by KfW IPEX-Bank will be processed in accordance with the principles established in the law, specifically for the purposes for which we have been authorized.

The processing carried out by KfW IPEX-Bank includes the collection, storage, use, processing, circulation, deletion, updating, transmission and/or transfer to any public entity or company that we subcontract for the development of our corporate purpose in Colombia and/or other countries that may eventually be considered as destinations without the same protection standards according to the Colombian Data Protection Authority.

In any case, we will only share your personal data for the purposes you have authorized, in accordance with the provisions of Colombian data protection regulations regarding confidentiality and information security.

3) Personal Data we collect and Purposes of processing

KfW IPEX Bank will process the data ensuring respect for the rights of the Data Subjects registered in its various databases, and specifically for the purposes described below:

Group	Categories and Types of Personal Data	Purposes
Customers/ Business Partners	Identification data in a business context (name, business address, business phone number, business email address)	<ul style="list-style-type: none"> • General communication • Management of customer/business partner relationships • Performance of contractual relationship • Distribution of newsletters • Managing visitations to the Representative Office
Local employees	<ul style="list-style-type: none"> • Identification data (e.g. name, address, phone number, email address, ID number, birthday, nationality) • Legitimation data (e.g. Identity card data) • Authentication data (e.g. sample of signature) • Insurance data (e.g. social security number) • Health data (e.g. sick days, severe disability data) • Qualification papers (e.g. certificates, evaluations) • Data related to service provision (e.g. time recording, training data, payroll data, target agreements, photos) 	Initiation and performance of employment relationship, such as <ul style="list-style-type: none"> • Recruitment process; • Salary paymentpayment of taes • social security • contributions • Enabling to ptovide the labour services • Evaluation of employee performance (trainings) • pension • Managing access control to the IT-system and the Representative office • Transmission of the data to authorities or other bodies, insofar as this is necessary due to legal requirements

4) Sensitive data

KfW IPEX-Bank requires sensitive data regarding the initiation and performance of employment relationships. Sensitive data will be processed in accordance with the principles enshrined in the Law, maintaining the confidentiality imposed by the right to intimacy, and especially avoiding any discrimination arising from the use of such data.

As the data subject, you are not obliged to provide us with sensitive data. Notwithstanding, please note there are certain procedures and processes for which the processing of such data will be necessary.

5) Data of minors

In the event KfW IPEX-Bank collects and processes personal data of minors, it will do it solely and exclusively with the prior, express, and informed consent of the parents and/or legal guardians, and for the purpose of fulfilling its legal obligations.

Additionally, the processing will be carried out in accordance with the provisions of article 2.2.2.25.2.9. of Decree 1074 of 2015, ensuring the best interest of the minor and respecting their fundamental and constitutional rights.

6) Cookies

The web page of KfW IPEX-Bank uses cookies and other technologies for the operation of our website, as well as for a pseudonymised recording of its usage. In this way, we can conduct analyses of user behaviour by collecting and analysing the information communicated by your browser. However, none of these analyses are linked to individual persons. Any personal identification characteristics, namely in this case the IP address, are deleted at the moment of processing and replaced by an indicator, which makes it impossible or at least extremely difficult to identify the data subject. This methodology ensures that KfW IPEX-Bank is routinely unable to establish a concrete link to particular persons.

7) Social media

You can access various social media channels from our website.

Caution: When choosing one of the following links, you will leave our website and be directed to the website of a social media platform. Any information available there was created without any involvement from us and we are therefore not responsible for this content. We do not accept any liability for the information being up-to-date, accurate or complete. Any reference to social media does not imply any approval on our part.

- Facebook Inc., 1601 Willow Road, Menlo Park, California 94025, USA
 - [Facebook privacy policy](#)
 - [Instagram privacy policy](#)
- Twitter, Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA
 - [Twitter privacy policy](#)
- Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
 - [Google privacy policy \(YouTube\)](#)
- LinkedIn Ireland, 70 Sir John Rogerson's Quay, Dublin 2, Ireland

- [LinkedIn privacy policy](#)
- XING AG, Dammtorstraße 30, 20354 Hamburg, Deutschland
 - [Xing privacy policy](#)
- Shorthand Pty Ltd.
 - [Shorthand privacy policy](#)

Particularly for reasons of data protection compliance, the relevant social media cannot be accessed directly. Corresponding notes are therefore displayed. In addition, you may first have to click on integrated buttons, thus giving your express consent to communication with the social media platform. Only after that will the browser connect you by establishing a direct connection with the social media platform's servers.

Please keep in mind that we are not aware of nor do we influence how and what data find their way to the social media platform.

By activating the button, you will provide the social media platform with the information that you have opened one of the web pages of the platform on the Internet. If you are already registered with the social media platform, it will be able to link your visit with your account on the social media platform. However, even if you have not yet registered with the social media platform, it is not possible to preclude the possibility that it will collect and/or store your IP address after you click on the platform.

8) Authorization

To the extent that it is legally required that the processing of personal data is permitted solely on the basis of the data subject's consent, we ensure, that the authorization was granted in an express, free, prior, and informed manner.

9) Data Subject rights

The data subjects whose Personal Data is processed will have the rights provided by Law 1581 of 2012 and all regulations that govern, add to, or complement it. Among these rights are:

- a) To know, update and amend their personal data.
- b) To request evidence of the authorization granted, unless expressly excluded as a requirement for the processing.
- c) To be informed by KfW IPEX-Bank, upon request, regarding the use given to their personal data.
- d) To file claims before the Superintendence of Industry and Commerce, for violations of the provisions of Law 1581 of 2012 and other regulations that amend, add to, or complement it.
- e) To revoke the authorization and/or request the data suppression, when the principles, rights, and constitutional and legal guarantees are not respected in the Processing.
- f) To have access, free of charge, to their personal data which have been subject to processing.

10) Transfers and Transmissions

KfW IPEX-Bank stores your personal data locally in the representative office in Bogota or in systems of the KfW IPEX-Bank head office in Frankfurt, Germany, in particular in the Customer Relationship Management System. In this case, you will receive a separate information notice which is automatically generated from the system.

KfW IPEX-Bank may transfer personal data to other data controllers to fulfill the purposes described in this policy. If necessary, the data transfers may be carried out within Colombia or to any other country worldwide, regardless of the protection schemes and levels adopted in each country.

Additionally, KfW IPEX-Bank may transmit data to data processors, such as our auditors, lawyers, external advisors, and our product or service providers. The data transmissions may be national or international, regardless of the protection schemes and levels adopted in each country.

11) Consults and Claims

For the effective exercise of your rights, KfW IPEX-Bank can be contacted via Email datenschutz-ipex@kfw.de.

- a) **Consults:** You and/or your successors may access your personal data free of charge once every month and whenever there are substantial modifications to this policy. To do so, you must send a request to datenschutz-ipex@kfw.de, which must contain the following information: (i) name and address of the data subject (or of the person authorized for this purpose) or any other means to receive a response to the request; (ii) documents that prove the identity of the data subject, or of the person authorized; and (iii) the description and purpose of the inquiry.

KfW IPEX-Bank must respond to the request within then (10) business days following receipt of the request. Additionally, KfW IPEX-Bank must inform if the request has any cost. If it is not possible to respond to the request within the aforementioned term, KfW IPEX-Bank must inform the solicitor of the reasons for the delay and indicate a new deadline for the response, which may not exceed five (5) additional business days from the expiration of the first term.

- b) **Claims:** You may file a claim to complain about non-compliance with this Privacy Policy and/or applicable law, or to request the correction, update, or deletion of your personal data. To do so, you must send a claim to datenschutz-ipex@kfw.de, which must contain the following information: (i) name and address of the data subject (or for the person authorized for this purpose) or any other means to receive a response to the request; (ii) documents that prove the identity of the data subject or of the person authorized; (iii) the description and purpose of the inquiry; (iv) if applicable, other documents or elements that are intended to be used.

If the claim is incomplete, KfW IPEX-Bank will require you to correct the information within five (5) business days following the receipt of the claim. If two (2) months have passed since the date of the request and you have not corrected the information, it will be understood that you have withdrawn the claim.

If the claim is complete KfW IPEX-Bank must respond within fifteen (15) business days following receipt of the claim. If it is not possible to respond to the claim within the aforementioned term, KfW IPEX-Bank must inform the requester of the reasons for the delay and indicate a new deadline for the response, which may not exceed eight (8)

additional business days from the expiration of the first term. If KfW IPEX-Bank is not competent to handle your claim, it will be forwarded to the appropriate party within a maximum of two (2) business days, and you will be informed of this situation.

12) Confidentiality and security measures

Your personal data will be stored in databases with security measures that protect the confidentiality of your information, and in particular, protect it against any damage, loss, alteration, destruction or unauthorized use, access, or processing.

13) Validity and amendments

This Privacy Policy may be modified and supplemented in compliance with the requirements established by the corresponding legal regulations. The duly updated Policy, indicating the date of update, will be promptly published on KfW IPEX-Bank 's website.

This policy will come into effect on 1st of January 2025.