

# OBJECTIVE, SCOPE AND DEFINITION

## OBJECTIVE

Define the general guidelines to comply with Law 1581 of 2012 and Decree 1377 of 2013 in Colombia, which regulates the handling of personal databases.

## SCOPE

This policy applies to all areas and/or persons who work with personal databases for the performance of their duties.

## DEFINITION

Colombia issued Statutory Law Number 1581 of 2012 for the protection of personal data. This law requires the observance of standards and practices that lead to the appropriate treatment of personal data of natural persons according to the provisions contained in the Law and the Constitution of Colombia. The Law is mandatory for all those who, in one way or another, deal with and/or are responsible for personal databases.

### Glossary

- **Database:** The organized set of personal data that is subject to handling.
- **Personal Data:** Any information linked to or that may be associated with one or more identified or identifiable natural persons.
- **Data Processor:** The public or private natural or legal person, which – by itself or in association with others – handles the personal data on behalf of the Data Controller.
- **Data Controller:** The public or private natural or legal person, which – by itself or in association with others – decides on the bases and/or handling of the data.
- **Authorization:** The prior, express and informed consent of the Record Holder to handle his or her personal data.
- **Record Holder:** The natural person whose personal data are subject to being handled.
- **Handling:** Any operation or set of operations on personal data, such as collection, storage, use, movement or deletion.
- **Natural Person:** The human being exercising rights and complying with his or her personal duties.
- **Grupo Nutresa:** The business group consisting of Compañía Nacional de Chocolates S.A.S., Compañía de Galletas Noel S.A.S., Novaventa S.A.S.,

Productos Alimenticios Doria S.A.S., Industria de Alimentos Zenú S.A.S., Alimentos Cárnicos S.A.S., Comercial Nutresa S.A.S., Servicios Nutresa S.A.S., La Recetta Soluciones Gastronómicas Integradas S.A.S., Meals de Colombia S.A.S., Industria Colombiana de Café S.A.S., Pastas Comarrico S.A.S., Tropical Coffee Company S.A.S., Industrias Aliadas S.A.S., Molinos Santa Marta S.A.S., Litoempaques S.A.S., Setas Colombianas S.A. and Gestión Cargo Zona Franca S.A.S.

- For purposes of this Policy, it is understood that Fundación Nutresa, Corporación Vidarium Centro de Investigación en Nutrición Salud y Bienestar, (Vidarium), Fondo Mutuo de Inversión de los Trabajadores de Compañía de Galletas Noel S.A.S., e Industria de Alimentos Zenú S.A.S., el Fondo Mutuo de Inversión de los Trabajadores de Alimentos Cárnicos S. A. S., and Fondo Mutuo de Inversión de los Trabajadores de Grupo Nutresa S. A. and subordinated companies are included in the concept of Grupo Nutresa.
- **Third Party:** Any legal or natural person other than the persons directly belonging to Grupo Nutresa.
- **Sensitive Data:** That information that affects the privacy of the Record Holder or the abuse of which can generate discrimination.
- **Public Data:** That information that is not semi – private, private or sensitive and that may be contained in, among others, records and public documents, gazettes and official newsletters and judicial decisions.

### **General Conditions**

To comply with Law 1581 of 2012, regarding the protection of personal data, the following considerations must be taken into account:

1. Any employee or area of a Grupo Nutresa company may be in charge of handling the data at some point in their working lives.
2. Grupo Nutresa S.A. is responsible for handling personal databases.
3. The third parties that, at a specific time, require personal databases become responsible and must comply with the obligations contained in Law 1581 of 2012 in Colombia, including obtaining the Record Holder's authorization to handle his or her personal information.
4. The law is mandatory throughout the Colombian territory and, to transmit personal data to other countries, the legislation regarding this information must contemplate safety measures, equal to or greater than those contained in the law in question.
5. Grupo Nutresa personal data bases include all natural persons, whether they are suppliers, members of the Mutual Funds, clients, consumers, volunteers

or those who have any relationship with Fundación Nutresa or Vidarium, employees or any other person whose information is subject to be handled by us.

The application of the exception to the policy contemplated in the Law is not necessary when:

- The databases and files are intended for national safety and defense, as well as the prevention, detection, monitoring and control of money laundering and the financing of terrorism.
- The databases are intended for and contain intelligence and counter – intelligence information.
- The databases and files are journalistic information and other editorial content.

### **Specific Conditions**

The following specific conditions must be taken into consideration: Higher Authorization

1. As of today, any employee who begins a labor relationship with any Grupo Nutresa company must have a clause in his or her contract that expresses the commitment to comply with Law 1581 of 2012 and Decree 1377 of 2013, in the event of being in charge of handling personal databases.
2. The internal work regulations shall include a text related to the obligation to comply with the Law and the Decree, to cover the entire universe today.
3. Any third party who, through his or her relation with the areas or companies of Group Nutresa, requires personal databases will be asked for a contractual clause that expresses his or her knowledge of the law and the responsibility to comply with it. He or she will also require prior authorization from the Record Holder to handle his or her personal information.
4. All suppliers, Mutual Fund members, clients, consumers, volunteers or those who have any relationship with Fundación Nutresa or Vidarium, employees or any other person whose information is subject to be handled by us will be asked for a written authorization to handle their data without restrictions. This should be extended to all the effects that arise in the performance of our duties.
5. In the authorization referred to in the previous point, the Record Holder must also make it clear that it is his or her responsibility to maintain the information current and accurate, communicating any modification thereto in a timely manner to the Grupo Nutresa companies to which he or she gave the authorization.

6. All the personal databases that the areas and companies of Grupo Nutresa handle must have a guarantee of recovery (backup).
7. There should be limited access to the personal databases. When sending personal databases through mass media, the databases must be sent with passwords so that access to the databases are also restricted.
8. The databases may not be published on the Intranet or the Internet without restrictions to access them.
9. The Grupo Nutresa companies should periodically promote campaigns to update their personal databases.
10. To handle the personal databases, all areas that handle this information must have a written procedure to ensure compliance with the Policy and Law 1581 of 2012 and its reglamentary decree.
11. All Grupo Nutresa companies must have procedures to handle complaints and/or claims, ensuring compliance with the law concerning this issue.

### **Contact Information**

This Policy applies to the companies listed below. To present questions or complaints, get more information or to view their personal data, request that the information be modified, updated, corrected or deleted, or to revoke the authorization for its handling, the following phone numbers and Internet pages indicated below may be contacted. The area responsible for responding to the request previously described is the Customer Service area for consumers and clients; for suppliers, the area is the Servicios Nutresa S. A. S. Procurement. This attention, for affiliates and suppliers of the Mutual Funds, will be handled directly by the Funds. Persons with any relationship with Vidarium or Fundación Nutresa, or who are their suppliers, may go to these entities for present their requests.

- Alimentos Cárnicos S. A. S.: Located at Carrera 40 #12A –13, Acopí, Yumbo, Valle; Customer Service Line: 01-8000-511300 or [www.alimentoscarnicos.com.co](http://www.alimentoscarnicos.com.co).
- Industria de Alimentos Zenú S. A. S.: Located at Carrera 64C #104-13, Medellín; Customer Service Line: 01-8000-519368 or [www.industriadealimentoszenu.com.co](http://www.industriadealimentoszenu.com.co).
- Novaventa S. A. S.: Located at Carrera 52 #20-124, Medellín; Customer Service Line: 01-8000- 515101 or 01-8000-512202 or [www.novaventa.com.co](http://www.novaventa.com.co).

- <http://www.meals.com.co>Meals de Colombia S. A. S.: Located at Avenida Carrera 70 #98-09, Bogotá; Customer Service Line: 01-8000-511835 or [www.meals.com.co](http://www.meals.com.co).
- Comercial Nutresa S. A. S.: Located at Carrera 52 #20-124, Medellín; Customer Service Line: 01-8000-521155
- Compañía Nacional de Chocolates S. A. S.: Located at Carrera 43A #1A Sur-143, Edificio Santillana, Medellín; Customer Service Line: 01-8000-522121 or [www.chocolates.com.co](http://www.chocolates.com.co).
- Compañía de Galletas de Noel S. A. S.: Located at Carrera 52 #2-38, Medellín; Customer Service Line: 01-8000-516635 or [www.noel.com.co](http://www.noel.com.co).
- Colcafé: S. A. S.: Located at Carrera 52 #20-124, Medellín; Customer Service Line: 01- 8000-510777 or [www.colcafe.com.co](http://www.colcafe.com.co).
- Productos Alimenticios Doria S. A. S.: Located at Km 5,6 Troncal de Occidente Bogotá, in Mosquera, Cundinamarca. Customer Service Line: 01-8000-511122 or [www.pastasdoria.com](http://www.pastasdoria.com).
- La Recetta Soluciones Gastronómicas Integradas S. A. S.: Located at Carrera 16 #95-70 in Bogotá; Customer Service Line: 01-8000-526767 or [www.larecetta.com.co](http://www.larecetta.com.co).
- Fundación Nutresa: Located at Carrera 52 #2-38 in Medellín; Customer Service Line: (574) 365-5600 Vidarium: Located at Carrera 52 #20-124 in Medellín; Customer Service Line: (574) 285- 6600
- Fondo Mutuo de Inversión de los Trabajadores de Alimentos Cárnicos S. A. S., and Fondo Mutuo de Inversión de los Trabajadores de Compañía de Galletas Noel S.A.S., and Industria de Alimentos Zenú S.A.S.: Located at Carrera 52 #2-38 in Medellín; Customer Service Line: (574) 365-5600
- Fondo Mutuo de Inversión de los Trabajadores de Grupo Nutresa S. A. and subordinated companies: Located at Carrera 52 #2-38 in Medellín; Customer Service Line: (574) 365-5600
- Servicios Nutresa S. A. S. and other companies that do not expressly appear listed in your Contact Information: Located at Carrera 52 #2-38 in Medellín; Customer Service Line: (574) 360-8870 or [www.grupoalimentosenlinea.com](http://www.grupoalimentosenlinea.com).

### **Rights of the Record Holder**

1. Know, update and correct his or her personal data;
2. Request proof of the authorization granted;
3. Be informed, upon request, regarding the use that has been given to his or her personal data;

4. After a complaint or inquiry, present a complaint to the Superintendent of Industry and Commerce for violations of the applicable legal regulations;
5. Revoke the authorization and/or request the suppression of the datum when the Constitutional and legal principles, rights and guarantees have not been respected.
6. Access his or her personal data without charge

**THIS POLICY REGARDING THE HANDLING OF PERSONAL DATA  
TOOK EFFECT ON APRIL 17, 2013**