

Personal data processing policy

Crystal S.A.S., as responsible and / or in charge of the processing of personal data, has adopted its Personal Data Processing Policy, expressed in the following terms:

1. Glossary

Authorization: Prior, express and informed consent of the owner to carry out the processing of personal data.

Database: Organized set of personal data that is processed.

Personal data: any information linked to or likely to be associated with one or more specific or determinable natural persons.

Sensitive data: one that affects the privacy of the owner or whose improper use may generate discrimination.

Data processor: natural or legal person, public or private, who by himself or in association with others, carries out the processing of personal data on behalf of the person responsible for the treatment.

Data processor: natural or legal person, public or private, who by himself or in association with others, carries out the processing of personal data on behalf of the person responsible for the treatment.

Holder: natural person whose personal data are processed.

Treatment: any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

2. Right to privacy and freedom of opinion and expression

Crystal S.A.S. respects and promotes the Universal Declaration of Human Rights and therefore incorporates articles 12 and 19 of that Declaration into this Policy.

- **Article 12:** No one shall be subjected to arbitrary interference with his or her privacy, family, home or correspondence, or to attacks on his or her honour or reputation. Everyone has the right to the protection of the law against such interference or attacks.

- **Article 19:** Everyone has the right to freedom of opinion and expression; this right includes the right not to be disturbed because of one's opinions, the right to investigate and receive information and opinions, and the right to disseminate them, without limitation of frontiers, by any means of expression.

3. Adherence to the Colombian legal system

All decisions and actions of **Crystal S.A.S.** related to the processing of databases are adjusted to Articles 15 and 20 of the Political Constitution, Law 1581 of 2012 and Decree 1377 of 2013 of the Republic of Colombia.

4. Information Security

Crystal S.A.S. is committed to protecting all the information it stores in its databases using protocols, tools and mechanisms reasonably accepted in the industry, with the objective of preventing its unauthorized use by third parties. The storage equipment for this information are located in safe, physically protected and accessible places.

Crystal S.A.S. is not responsible for any consequences arising from improper income, illegal and fraudulent to its databases, of any technical failure in its storage systems of information or theft from your storage equipment.

5. Data collection and storage

Crystal S.A.S. collects and stores the personal data necessary for the development of your commercial activities, the provision of your services, the administration of your business, the realization of banking transactions and compliance with obligations imposed by the State.

Crystal S.A.S. does not collect or store sensitive personal data.

Crystal S.A.S. does not assign or market any information stored in its databases.

6. Use of Information

Crystal S.A.S. uses its databases, through its own stores, internet, social networks, fixed or mobile telephony or any other analog or digital transmission technology, only to send information about your products and services, products and services of your customers, products and services of the media and suppliers you represent; sending your offers, offers from your customers and offers from the media and suppliers it represents; sending your invitations, invitations from your customers and invitations from the media and suppliers it represents, to launches, presentations, parties, concerts, recreational or entertainment events and other commercial and/or public relations activities; sending congratulations on anniversaries, birthdays and special days, among other dates; sending sweepstakes, raffles or contests designed by her, her clients or the media and suppliers she represents; sending information about recognitions, awards and achievements achieved by it, by its customers or by the media and suppliers that represents; sending newsletters, catalogues, magazines and other online media; sending proposals, campaigns, strategies, tactics and digital files of pieces and advertising or communication; sending requests for: digital files,

advertising or communication pieces, information specific, resolution of concerns, negotiating letters and other relevant documents in the normal development of its commercial and service relationships; sending reports on activities and/or trends advertising and marketing; sending responses to concerns, suggestions or requirements about services and products; sending survey or survey forms to evaluate the quality of your products and/or services and the products and/or services of its customers and the media and suppliers it represents; submission of forms type survey or survey to know information and opinions about products, services, media and internet, among others and sending messages that contribute to the normal development of its commercial activities and service.

Crystal S.A.S. is obliged to provide the information in its databases to the judicial or administrative entities of the Colombian State that request it in the performance of their functions Legal.

7. Vulnerability of information transmission

Crystal S.A.S. acknowledge and agree that no transmission of information over the internet is absolutely safe; however, it implements all protocols, tools and security mechanisms reasonably accepted by the industry for the protection of information during transmission. Likewise, expects its interlocutors to implement their own protocols, tools and security mechanisms in their equipment and private networks for the transmission of information over the Internet.

8. Rights of the holder of personal data

In accordance with Article 8 of Law 1581 of 2012, the natural person whose personal data are subject to treatment (owner), you will have the following rights:

- a)** Know, update and rectify your personal data in front of the persons responsible or in charge of the treatment. This right may be exercised, among others, against data partial, inaccurate, incomplete or fractional, misleading, or those whose treatment is expressly prohibited or not authorized;
- b)** Request proof of the authorization granted to the person in charge of the treatment, except when it is expressly excepted as a requirement for the treatment, in accordance with the provided for in Article 10 of this Law;
- c)** Be informed by the person responsible or in charge of the treatment, upon request, regarding the use you have given to your personal data;
- d)** Submit to the Superintendence of Industry and Commerce complaints for violations of the provisions of this Law and the other rules that the modify, add or supplement;
- e)** Revoke the authorization and / or request the deletion of the data when in the treatment does not respect the principles, rights and constitutional and legal guarantees. Revocation and/or suppression will proceed when the Superintendence of Industry and Commerce has determined

that in the treatment the responsible or in charge have incurred in conduct contrary to this Law and the Constitution;
f) Access in form free of charge to your personal data that have been processed. In accordance with Article 9 of Law 1581 of 2012, without prejudice to the exceptions provided for by law, in the processing of data the prior and informed authorization of the holder, which must be obtained by any means that may be subject for later reference.

9. Changes to this Policy

Crystal S.A.S. may at any time and unilaterally modify its Policy of processing of personal data. Any changes will be posted and announced.

Crystal S.A.S. will retain all versions of its Data Processing Policy Personal.

10. Attention to petitions and claims

For the management of petitions, claims and complaints or for the exercise of their rights, the Data Subject personal may contact **Crystal S.A.S.** to the emails of your brands:

Gef: servicioalcliente@gef.com.co

Punto Blanco: servicioalcliente@puntoblanco.com.co

Baby Fresh: servicioalcliente@babyfresh.com.co

Galax: servicioalcliente@galax.com.co

or call the customer service line 01 8000 517 536. **Crystal S.A.S.** will respond to the petitioner within the terms established by Law 1581 of 2012 for the case of petitions and claims, respectively; for this purpose, the request must contain all the necessary data applicable to the Right of Petition to ensure timely and effective response, and to contain a clear and accurate description of the data personal with respect to which the owner seeks to exercise any of his rights. Any request, to be processed, must be presented by the owner of the data or by his legal representative; therefore, **Crystal S.A.S.** has the right to verify the identity of the petitioner by any middle. Regardless of the mechanism used for filing petitions, claims and complaints, these will be attended within a maximum period of ten (10) business days counted from the date of receipt. When it is not possible to attend the consultation within that period, the interested party will be informed before his expiration, expressing the reasons for the delay and indicating the date on which your query will be attended, which in no case may it exceed five (5) business days following the expiration of the first term. Requests for updating, correction, rectification or deletion of the data will be answered within of the following fifteen (15) business days, counted from the day following the date of receipt. When it is not possible to attend them within that term, the interested party will be informed before the expiration. of the aforementioned period, the

reasons for the delay and the date on which your claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

11. Authorization for the processing of personal data

The Owner declares that he knows and accepts this Personal Data Processing Policy and authorizes **Crystal S.A.S.**, in a free, prior, voluntary, express and duly informed manner, to be carried out the processing of your personal data in accordance with this Personal Data Processing Policy during the time that **Crystal S.A.S.** develop its commercial and service activities.

The Owner declares that the non-request for deletion of their personal data after the notification of a New version of this Policy, constitutes acceptance of it.

12. Authorization for the processing of personal data collected before June 27, 2013

In accordance with Numeral 4 of Article 10 of Decree 1377 of 2013, if within the term of thirty (30) working days counted from July 22, 2013, the owner has not requested the deletion of their data Personal **Crystal S.A.S.** may continue the processing of such data as indicated by your Personal Data Processing Policy, as long as it is analogous or compatible with the use for which were initially collected.

