Contenido

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

Introduction

WORLD TRAVEL ASSIST LATAM establishes this Personal Data Processing Policy to guarantee the constitutional right to habeas data and to ensure compliance with the regulations governing it, such as Law 1581 of 2012 and its regulatory decrees, as well as the guidelines established by the organization.
The application of this policy is mandatory for all natural or legal persons who process personal data recorded in the organization's databases, with the purpose of providing the necessary guidelines for compliance with legal obligations regarding personal data protection.

Objective

The purpose of this Policy is to provide the necessary and sufficient information to the various stakeholders and to establish guidelines that ensure the protection of personal data through the organization's procedures. These procedures define the criteria and guidelines for the collection, storage, use, circulation, and deletion of data, with the aim of protecting and guaranteeing the confidentiality and integrity of information through technical, physical, and administrative measures, thereby restricting unauthorized third-party access to the data, in compliance with Law 1581 of 2012 regulated by the Congress of the Republic.

Scope

This policy applies to all databases, both physical and digital, that contain personal data and are subject to Processing by World Travel Assist Latam, acting as the responsible party. Additionally, it applies in cases where the organization operates as a data processor. This policy also applies to information processed for users of services acquired in Colombia.

Mandatory Nature

This policy is mandatory and strictly enforceable by executives, collaborators, associates, agents, consultants, and contractors who, due to their roles, must have access to the personal data provided to World Travel Assist Latam as the Data Controller and/or Processor, due to a contractual relationship that necessitates such processing. In addition to the legal and regulatory provisions governing the matter, the processes, procedures, and instructions that develop the policy for personal data protection at World Travel Assist Latam, as well as the instructions

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

provided by the client company or strategic ally acting as the Data Controller, World Travel Assist Latam, as the Data Processor, establishes the following manuals, policies, and internal actions:

- Procedure for the Processing of Personal Data
- Privacy Notice and Express Authorization for the Processing of Personal Data
- World Travel Assist Latam will undertake all actions necessary for the dissemination and implementation of the Policy.

Guiding Principles

In the development, interpretation, and application of the law, regulations, and current standards, the following principles will be applied harmoniously and comprehensively:

a) Principle of Legality in Data Processing: Processing is a regulated activity that must adhere to the provisions of Law 1581 of October 17, 2012, its regulatory decrees, and other related regulations.

b) Principle of Purpose: Processing must comply with a legitimate purpose according to the Constitution and the Law, which must be communicated to the Data Subject.

c) Principle of Freedom: Processing can only occur with the prior, express, and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or judicial mandates that exempt consent.

d) Principle of Truthfulness or Quality: The information subject to Processing must be truthful, complete, accurate, updated, verifiable, and understandable. The processing of partial, incomplete, fragmented data, or data that may lead to error is prohibited.

e) Principle of Transparency: Processing must guarantee the Data Subject's right to obtain information from the Data Controller or Processor, at any time and without restrictions, about the existence of data concerning them.

f) Principle of Restricted Access and Circulation: Processing is subject to the limits derived from the nature of the personal data, legal provisions, and the Constitution. In this sense, Processing can only be carried out by persons authorized by the Data Subject and/or those specified by law. Personal data, except for public information, should not be available on the Internet or other mass communication media unless the access is technically controllable to provide restricted knowledge only to the Data Subjects or authorized third parties.

g) Principle of Security: Information subject to Processing by the Data Controller or Processor, as referred to by law, must be handled with the technical, human, and administrative measures necessary to ensure the security of records, preventing alteration, loss, consultation, use, or unauthorized or fraudulent access.

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

h) Principle of Confidentiality: All employees and contractors involved in the Processing of Personal Data, which is not public in nature, are required to maintain the confidentiality of the information, even after their relationship with any of the Processing activities ends. They may only disclose or communicate personal data when it pertains to the authorized activities defined by law and in accordance with it. The organization is committed to treating the personal data of the Data Subjects as outlined in the PERSONAL DATA PROCESSING POLICY, as defined in section g of Article 3 of Law 1581 of 2012, with absolute confidentiality, using the data exclusively for the purposes indicated in the previous section, provided the Data Subject has not opposed such processing.

Data Categorization

The processing carried out by World Travel Assist with personal information includes the collection, storage, use, and circulation and may cover the following types of data:

- **Public Nature:** These are considered to include, among others, data related to a person's civil status, profession or occupation, and their status as a merchant or public servant. By nature, public data can be found in public records, official documents, gazettes, official bulletins, and final judgments that are not subject to confidentiality.
- **Private and Semiprivate Data, with Prior Authorization from the Data Subject:** These are data that are neither intimate, reserved, nor public, and whose knowledge and disclosure may be of interest not only to the Data Subject but also to a certain sector or society at large. Examples include financial and credit data related to commercial or service activities.
- **Sensitive Data**, **with Prior Authorization from the Data Subject and Noting the Voluntary Nature**: These are data that affect the Data Subject's privacy or may lead to discrimination, such as data revealing racial or ethnic origin, health status, genetic information, biometric data, religious, philosophical, and moral beliefs, union affiliation, political opinions, and sexual preferences.
- **Data of Minors:** This data is collected with prior, clear, and explicit authorization from their legal representatives, considering the minor's right to be heard.
- **Biometric Data**: In the course of its activities, biometric personal information such as signatures, fingerprints, facial photographs (selfies), facial recognition, among others, may be collected to facilitate the identification of Users and/or Data Subjects within the company, with prior authorization from the data subjects.
- **Health-Related Data:** This includes personal data related to an individual's physical or mental health, including the provision of healthcare services, that reveals information about their health status.

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

Processing of Sensitive Data

The processing of sensitive data is prohibited except in the following cases:

a) The Data Subject has given explicit consent for such processing, unless the law does not require such consent.

b) The processing is necessary to safeguard the vital interests of the Data Subject who is physically or legally incapacitated. In these cases, legal representatives must provide their authorization.

c) The processing refers to data necessary for the recognition, exercise, or defense of a right in a judicial process.

d) The processing serves historical, statistical, or scientific purposes. In this case, measures must be adopted to ensure the anonymization of the Data Subjects.

Processing and Purpose

The purpose of processing personal data is to fulfill the contractual objective that generates it, including the provision of national and international medical and dental assistance, medical audits, and claims settlement. Due to the nature of these services, this involves sensitive data related to the health and safety of the Data Subject.
Additionally, personal data will be processed for providing other types of assistance, such as luggage loss, legal and informational assistance, vehicle, movable and immovable property assistance, as well as services related to calls, promotion, and sale of services. These purposes may be carried out through physical, electronic, or telephonic means.

Transfer and Transmission of Personal Data

World Travel Assist Latam may transfer and transmit personal data to third parties with whom it has operational relationships that provide necessary services for its proper functioning, or in accordance with the functions established by law. In such cases, measures will be taken to ensure that individuals who have access to personal data comply with this Policy and with the principles of personal data protection and obligations established by the Law.
In the case of transfer, the obligations stipulated in Law 1581 of 2012 and its regulatory norms will be fulfilled.

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

Rights and Legality Conditions for Data Processing

Rights of the Data Subjects:
In the processing of personal data by World Travel Assist Latam, the rights of the Data Subjects will be fully respected, which include:

a) **To know, update, and rectify** the data held by the Data Controller or Processor.

b) **To request proof of the authorization given** or any other documentation signed by the Data Subject for this purpose, unless expressly exempted as a requirement for data processing according to the law.

c) **To be informed by the organization or Data Processor**, upon request, about the use that has been made of the data.

d) **To file complaints with the competent authority** for violations of the law and other regulations that amend, replace, or add to it.

e) **To revoke authorization and/or request the deletion** of data when the processing does not respect constitutional and legal principles, rights, and guarantees. Revocation and/or deletion will proceed if the competent authority has determined that the organization or Data Processors have engaged in conduct contrary to the law and the Constitution. Revocation will proceed as long as there is no legal or contractual obligation to retain the personal data.

f) **To access free of charge** the personal data that has been processed.

Authorization of the Data Subject:

Without prejudice to the exceptions provided by law, processing requires the prior and informed consent of the Data Subject, which must be obtained through any means that can be subject to subsequent verification. Authorization will be considered to meet these requirements when it is expressed (i) in writing, (ii) orally, or (iii) through unequivocal conduct by the Data Subject that reasonably allows for the conclusion that consent was given. Examples include: when a user is informed that continuing with the communication will imply acceptance of the policy; when a resume is sent to the organization to participate in selection processes; or when entering premises with knowledge of the existence of surveillance systems.

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

Cases Where Authorization Is Not Required

Authorization from the Data Subject is not necessary in the following cases:

a) **Information required by the organization** in the exercise of its legal functions or by court order.

b) **Publicly available data**.

c) **Medical or health emergencies**.

d) **Processing of information authorized by law** for historical, statistical, or scientific purposes.

e) **Data related to the Civil Registry of Individuals**.

Anyone accessing personal data without prior authorization must comply with the provisions of Law 1581 of 2012 and other relevant and current regulations.

Persons to Whom Information May Be Disclosed

Information meeting the conditions established by law may be provided to the following persons:

a) **The Data Subjects, their heirs, or their legal representatives**.

b) **Public or administrative entities** in the exercise of their legal functions or by court order.

c) **Third parties authorized by the Data Subject or by law**.

General Actions for the Protection of Personal Data

The following are the general guidelines applied by World Travel Assist Latam to comply with its obligations under the principles for the management of personal data. These guidelines are supplementary to the existing and implemented general policies, procedures, or instructions, including data management policies, and are not intended to replace or disregard them.

Use of Information:
Personal information contained in databases must be used and processed according to the purposes described in section 8 of this policy. If any area identifies new uses different from those described in this personal data processing policy, it must inform the Information Security Officer, who will evaluate and manage its inclusion in this policy if applicable. Additionally, the following should be considered:

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

a) If an area different from the one that initially collected the personal data requires the use of such data, it may do so as long as it is a foreseeable use based on the type of services offered by the organization and for a purpose contemplated within this Personal Data Processing Policy.

b) Each area must ensure that in the practice of recycling physical documents, confidential information or personal data is not disclosed. Therefore, resumes, academic certificates, work certifications, medical exam results, or any document containing information that identifies a person cannot be recycled.

c) If a processor has provided personal data or databases to any area for a specific purpose, the area that requested the personal data must not use this information for a purpose different from that specified in the Personal Data Processing Policy. At the end of the activity, it is the responsibility of the area that requested the information to delete the database or personal data used, avoiding the risk of outdated information or cases where a Data Subject may have filed a complaint during that time.

d) Employees must not make decisions with significant impact on personal information or with legal implications based solely on information from the information system. They should validate the information through other physical or manual means and, if necessary, directly from the Data Subject.

e) Only authorized employees and contractors may enter, modify, or delete data contained in databases or protected documents. User access permissions are granted by the Technology and IT Office according to established profiles, which will be defined in advance by the leaders of the processes requiring the use of personal information.

f) Any use of the information different from that established must be consulted with the Information Security Officer in advance.

Data Storage:
Digital and physical data is stored in media or environments with appropriate controls for data protection. This includes physical and IT security controls, technological safeguards, and environmental controls in restricted areas, within the organization's facilities and/or third-party managed data centers or document centers.

Destruction of Information:
The destruction of physical and electronic media is carried out using methods that prevent reconstruction. This is done only in cases where it does not contravene any legal regulations, while always maintaining the respective traceability of the action. Destruction includes information held by third parties as well as within the organization's facilities.

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

Incident Management Procedure with Personal Data:

An incident is understood to be any anomaly that affects or could affect the security of databases or the information contained within them.

If an incident occurs, the user must report it to the Information Security Officer, who will take appropriate measures in response to the reported incident, investigate the report, and implement necessary corrective actions. Incidents can impact both digital and physical databases and will trigger the following activities:

a) **Incident Notification**: When an incident is suspected to affect or have affected databases containing personal data, it must be reported to the Information Security Officer, who will manage its reporting in an incident report.

b) **Incident Management**: It is the responsibility of each employee, user, client, or third party to promptly report any suspicious events, weaknesses, or policy violations that could impact the confidentiality, integrity, and availability of the organization's assets and personal information.

c) **Identification**: All suspicious or abnormal events, such as those indicating potential loss of confidentiality or secrecy of information, must be assessed to determine if they constitute an incident and must be reported to the appropriate level within the organization. Any decision involving investigative and judicial authorities must be made jointly by the Information Security Officer and general management. Communication with such authorities will be conducted by them directly.

d) **Containment, Investigation, and Diagnosis**: The Information Security Officer must ensure actions are taken to investigate and diagnose the causes of the incident, and must ensure that the entire incident management process is properly documented, with support from the Technology and IT Office. If a computer crime is identified, as defined in Law 1273 of 2009, the Information Security Officer and general management will report this information to the relevant judicial investigative authorities. During investigation processes, the "Chain of Custody" must be preserved in case legal action is required.

Responsible Area for Handling Requests, Queries, and Complaints:

The position responsible for handling requests, queries, and complaints at World Travel Assist is the Information Security Officer. Contact can be made via the official email at official_informacion@wtabyhas.com, as well as through the ethics mailbox available at "Has somos todos."

La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist

Access Control and Video Surveillance

Areas where processes related to confidential or restricted information are executed must have access controls that only permit entry by authorized personnel and allow for tracking of entry and exit activities.

Video Surveillance
The organization utilizes video surveillance cameras to comply with physical security policies. Images will be retained for a maximum of 10 days. If the images are involved in a complaint, grievance, or any judicial process, they will be kept until the matter is resolved.

Disclosure and Training

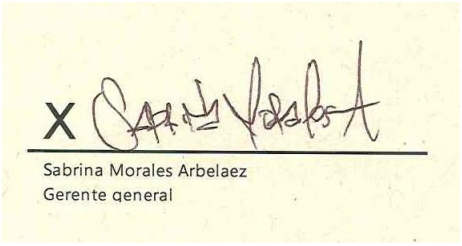
Management will define the processes for disclosing and training on the content of this policy for executives, employees, suppliers, and third parties who work with or have a direct relationship with the organization, as well as for the data subjects.

Validity and Updates

The Personal Data Processing Policy will be reviewed and updated annually or as needed based on corporate requirements.

Document Approval

The Data Processing Policy is established and approved by Management on December 11, 2023.



La información contenida en este documento es de propiedad World Travel Assist y podría contener información reservada y confidencial que no puede ser divulgada, difundida, ni aprovechada en forma alguna. Si usted ha recibido este documento por error, le pedimos eliminarlo y avisar inmediatamente a World Travel Assist