

PERSONAL DATA PROCESSING PRIVACY POLICY
GRUPO EMPRESARIAL PROMOTORA MÉDICA LAS AMÉRICAS
(Las Americas Medical Promoter Corporate Group)

1. OBJETIVE

To define the company's guidelines to handle Grupo Empresarial Promotora Medica Las Americas' users' personal data pursuant to what is set forth in bylaw 1581 of October 17, 2012 and all other regulatory provisions.

2. EXTENT

The following policy is applicable to gathering, managing and protecting all of Grupo Empresarial de Promotora Médica Las Américas S.A.'s databases.

The following policy is for the processing of personal data that Grupo Empresarial de Promotora Medica Las Americas obtains and manages through a written or digital authorization. Likewise, this applies to the processing of personal data that Grupo Empresarial de Promotora Médica Las Americas affiliates acquire including Las Americas Cancer Institute (Instituto de Cancerología Las Américas) and its branches, Las Americas Clinical Lab (Laboratorio Clínico Las Américas) and its branches, Las Americas Pathology (Patología Las Américas), Las Americas Foundation (Fundación Las Américas), Las Americas Employee Fund (Fondo de Empleados Las Américas), Fonaméricas Mutual Investment Fund (Fondo Mutuo de Inversión), Las Américas Clínica del Sur and Dentistry (Clínica del Sur y Odontología Las Américas), so Grupo Empresarial de Promotora Medica Las Americas shall be the centralizer and manager of all the group's databases.

3. DEFINITIONS

The definitions set forth in bylaw 1581 of 2012 and complementary regulatory decrees have been taken into account for the effects of this policy.

- a. **AUTHORIZATION:** It is a prior express informed consent obtained from the owner of personal data to process their information.
- b. **PRIVACY NOTICE.** It is an oral or written communiqué a company posts for owners of personal data being processed to inform the existence of applicable data processing policies, how to access them, and the purpose of the intended processing of personal data.
- c. **DATABASE:** It is a set of organized personal data being processed.

- d. **PUBLIC DATA.** It is data which is not semiprivate, private or sensitive. Public data includes, among others, data related to people's marital status, their profession or occupation and their quality as merchant or public servant. By nature, public data may be contained, among others, in public records, public documents, gazettes, official newsletters and duly executed court sentences which are not part of a legal reserve.
- e. **SENSITIVE DATA.** Sensitive data are those which affect the intimacy of the owner of the information or whose undue use may generate a person's discrimination like those that reveal racial or ethnic origin, political orientation, religious or philosophical beliefs, union memberships, social organizations, human rights or which promote interests of any political party or guarantee their rights and rights of opposing political parties, and data related to health, sex life and biometric data.
- f. **PERSON IN CHARGE OF A PROCESSING.** This is a natural person or a legal, public or private person who works alone or associated with others conducting the processing of personal data on behalf of party responsible for processing.
- g. **HABEAS DATA.** This is the legal recourse available to everyone which allows them access to a data bank or storage of personal data which includes their own data references. Subjects have the right to demand that data may be partially or totally corrected in the event that they may cause them any damage or which may be mistaken.
- h. **PERSON RESPONSIBLE FOR PROCESSING.** This is a natural person or a legal, public or private person who alone or associated with others makes decisions regarding databases and/or data processing.
- i. **OWNER OF THE INFORMATION.** This is a natural person whose personal data is being processed.
- j. **TRANSFER.** Data transfer occurs when the party responsible and/or in charge of personal data processing, located in Colombia, sends information or data to a receptor, which at the same time is responsible to for processing and which is located in Colombia or abroad.
- k. **BROADCASTING.** This is the processing of personal data which implies the communication of said personal data in or out of the territory of the Republic of Colombia when the object of the party in charge is to draw up a document on behalf of the responsible party.

- I. **PROCESSING.** Any operation or set of operations regarding personal data including gathering, storing, using, circulating or suppressing it.

4. DESCRIPTION

4.1. GENERAL INFORMATION

Name or business name: Promotora Médica Las Americas S.A.

Registered address: Medellín

Address: Diagonal 75 B No. 2A 120/140

E-mail: protecciondatospersonales@lasamericas.com.co

Responsible party's telephone: 342 10 10 Ext. 2001

4.2. PROCESSING DATA ARE SUBMITTED TO, AND THE PURPOSE THAT PROCESSING HAS WHEN DATA HAVE NOT BEEN INFORMED VIA A PRIVACY NOTICE

The data processing to which information is submitted is used strictly for purposes set forth in the privacy notice. That is for purposes related to the corporate object, especially for contract purposes, commercial purposes and loyalty purposes described in the personal data processing policy. Information is confidential as long as it is not required to be disclosed to comply with legal obligations as healthcare providers.

Personal data Grupo Empresarial Las Americas has are treated according to the general nature processing has as to:

- Communicate information to interest groups regarding healthcare services, academic and corporate events, and publications and publicity for healthcare-related topics
- Fulfill all obligations derived from existing contract relations with interest groups
- Know prospectively the needs of their interest groups to innovate in providing their services
- Establish company loyalty programs
- Inform about new services, branches and schedules

4.3. Rights And Duties

4.3.1. About the Owners of Personal Data:

In accordance with what is set forth in article 8 of Law 1581 of 2012, the owners of personal data have the following rights:

- To know, update and rectify personal data before GRUPO EMPRESARIAL LAS AMERICAS and its affiliates acting as the Party Responsible and In Charge of processing.
- To request evidence of an authorization granted to the party responsible for the processing of data acting as the party in charge of processing.
- To be informed by GRUPO EMPRESARIAL LAS AMERICAS and its affiliate companies about the use the company gives to personal data after being requested.
- To submit before the Superintendencia of Industry and Business (Superintendencia de Industria y Comercio) complaints regarding infractions to what is set forth in Law 1581 of 2012 once the processing has been exhausted to consult or complain before the party responsible for processing.
- To revoke authorization and/or request the suppression of data when legal and constitutional principles, rights and guarantees are not respected in the processing of the data.
- To access free of charge their processed personal data.

These rights may be exercised by:

- Owners who must accredit their ID.
- Owners' assignees who must accredit their status.
- Owners' representative and/or proxy, after accrediting representation or Power
- Another party for or in favor of whom the owner has set forth.

Rights of boys, girls and adolescents

In processing of personal data, respect for minor's prevailing rights are assured.

Processing of minors' personal data, except for those of a public nature, and in this case, processing must meet parameters including to:

- Respond and respect the higher interest of boys, girls and adolescents.
- Assure the respect of minor's fundamental rights.

GRUPO EMPRESARIAL LAS AMERICAS, shall watch over the adequate and responsible use of minors' personal data, and their rights to the privacy and protection of their personal data.

4.3.2. Duties related to the Processing of Personal data.

GRUPO EMPRESARIAL LAS AMERICAS shall always bear in mind that personal data are property of the natural persons about whom the data refers to, and only they can decide about said data. Thus, GRUPO EMPRESARIAL LAS AMERICAS shall use said data for those purposes for which it has faculties duly granted on the authorization obtained when data was gathered. The group shall always respect the mandates of the Constitution, Law 1581 of 2012 regarding the protection of personal data and Decree 1377 of 2013 which regulates it. In accordance with what is set forth in article 17 of Law 1581 of 2012, GRUPO EMPRESARIAL LAS AMERICAS, agrees that in matters regarding the processing of personal data it shall permanently fulfill the following duties to:

- Guarantee owners, that at all times, they shall have full effective exercise of the right to habeas data.
- Conserve information under conditions of security necessary to avoid adulteration, loss, and unauthorized or fraudulent consultation, use or access.
- Carry out promptly updating, rectifying or suppressing data, that is, pursuant to articles 14 and 15 of Law 1581 of 2012.
- Process searches and claims submitted by owners in accordance with what is set forth in article 14 of Law 1581 of 2012.
- Insert in the database, the text "information being discussed judicially" once notified by the competent authority about court proceedings related to the quality or details of a personal datum.
- Abstain from disclosing information which the owner is controverting and which the Superintendence of Industry and Business (Superintendencia de Industria y Comercio) has ordered blocked.
- Permit access to information just to people who are allowed to have access.
- Inform the Superintendence of Industry and Business (Superintendencia de Industria y Comercio) when there are violations of security codes and when there are risks in managing owners' data.
- Fulfill instructions and requirements ordered by Superintendence of Industry and Business (Superintendencia de Industria y Comercio).

4.4. Access, Search and Complaint Procedures

Law 1581 of 2012 grants all natural persons rights and guarantees which seek to endow them with tools to protect their personal data and the use given to them. Every right that pretends to be effective must have a known efficient mechanism by which this right is given validity.

Then, the party responsible for the processing of personal data presents the rights which may have validity for us, as owners of the data, and mechanisms we have available for that purpose.

4.4.1. Right to Access:

The power to dispose or decide that owners have of the information they own implies the right to access and to know if their personal data are object of processing and if so its extent. The party responsible for processing guarantees owners their right to access as follows:

- If the owners of the data request it, they will be able to find out if for certain GRUPO EMPRESARIAL LAS AMERICAS is processing their data.
- Owners may have access to the personal data the party responsible for processing may have.
- GRUPO EMPRESARIAL LAS AMERICAS shall inform owners when the group obtains their data about the type of personal data processed and all and each one of the purposes that justify processing.

4.4.2. Searches:

In accordance with what is set forth in article 14 of Law 1581 of 2012, owners or their successors or delegates may search owners' personal data recorded in company databases. Consequently, the party responsible for processing guarantees the right to search providing owners all the information contained in individual records or which is linked to owners' ID.

To handle personal data searches GRUPO EMPRESARIAL LAS AMERICAS guarantees:

The group shall enable an owner hot line calling 342 10 10 ext. 2001, and an e-mail address at protecciondatospersonales@lasamericas.com.co.

In any case, independent of the mechanism implemented to handle search requests, they shall be replied within a term of (10) ten workdays starting from the date the request is received.

Whenever it is not possible to enable a search within said term, the party requesting shall be informed before the expiration of the 10 days informing the party the reasons for a delay and setting a date when their search shall be possible. This new date cannot exceed (5) five workdays following the expiration of the first term.

4.4.3. Complaints:

In accordance with what is set forth in article 14 of Law 1581 of 2012, owners or their successors or delegates who deem that the information contained in a database must be corrected, updated or suppressed, or when they notice an alleged breach of any of the duties contained in Law 1581 of 2012, they may submit a complaint before the party responsible for processing, which shall be processed according to the following rules:

- A complaint shall be formulated via a request addressed to the party responsible for processing or the party in charge of processing identifying the owner, describing the facts that led to the complaint, giving an address and including documents that support the complaint. If a complaint is incomplete, the party submitting it shall be asked to correct flaws within the following (5) five days after having received the complaint. Once two (2) months have gone by since the date of the request and the applicant has not submitted the required information, the group shall deem that the request was withdrawn. In the event that GRUPO EMPRESARIAL LAS AMERICAS and its affiliate companies is not competent to resolve a complaint, the group shall transfer it to whoever it may correspond to do so within a maximum term of five (5) workdays and shall inform the interested party.
- Once a complete complaint is received, a label that reads "complaint in process" and the reason for the complaint will be included in the database within a term that does not exceed five (5) workdays. That label must be kept until the complaint has been resolved.
- The maximum term to resolve a complaint shall be fifteen (15) workdays starting from the day after the date it was received. When it is not possible to resolve the complaint within said term before said term expires, the party who submitted the complaint shall be informed of the reasons for the delay and a date when that complaint shall be handled. In any case, the term cannot exceed eight (8) workdays after the expiration of the first term.

4.5. A right to updating, rectification and suppression

To develop the principle of veracity or quality in personal data processing, reasonable measures have been adopted to assure that the personal data recorded in our databases are precise and sufficient, and that when the owner of the information requests it or when the party responsible for the data may have noticed it, the data shall be updated, rectified or suppressed so that they may fulfill the purpose of the processing.

Owners of the information always have the right to request GRUPO EMPRESARIAL LAS AMERICAS the elimination of their personal data when:

- They consider that their data is not being treated in accordance with the principles, duties and obligations set forth in Law 1581 of 2012.
- Data has stopped being necessary or pertinent for the purposes they were collected.
- The term necessary to fulfill the aims for which the data were collected has expired.

This suppression implies a total or partial elimination of personal data from records, files, databases or processing conducted by GRUPO EMPRESARIAL LAS AMERICAS in accordance with what an owner of information requests. It is

important to bear in mind that the right to cancel is not absolute, and the party responsible for the information may deny this right in the following cases:

- A request for suppression of information will have no effect when an owner of information has a legal or contractual duty to remain in the database.
- It is not possible to proceed with the elimination of data when there is a court ruling or an administrative provision with jurisdiction in the territory of Colombia.
- Data are required to protect an owner's interests legally acquired, or guarantee the fulfillment of an obligation legally acquired by an owner of information.

4.6. AUTHORIZATION

Collecting, storing, using, disclosing or suppressing personal data by GRUPO EMPRESARIAL LAS AMERICAS requires owners' free prior expressed informed consent.

GRUPO EMPRESARIAL LAS AMERICAS as the party responsible for processing personal data found in the company's databases has made use of the mechanisms necessary to obtain owners' authorization guaranteeing in every case that it shall be possible to verify the consent of said authorization.

4.6.1. Way and Mechanisms to Grant Authorization.

An authorization may be a hard-copy or a digital document. The contents of an authorization granted to collect and process data shall be issued by GRUPO EMPRESARIAL LAS AMERICAS, and it shall be made available for owners of information prior to the processing of their personal data in accordance with what is set forth in Law 1581 of 2012.

With the procedure of a contemplated authorization, we guarantee that the owners of personal data have been informed of the fact that their personal data shall be collected and used for some determined known purposes. They also have the option of knowing about any alteration of their personal data and the use given to their data. The above intends to help owners of personal data to make informed decisions regarding their personal data and have control of the use given to their personal data.

The authorization GRUPO EMPRESARIAL LAS AMERICAS shall request in any case from the owners of personal data is a statement which informs them:

- Who collects their data (party responsible or in charge).
- What data they collect.
- For what they are collecting the data (the aim of processing)
- Mechanisms to know, consult, update, rectify or request the suppression of their data.

4.6.2. Proof of Authorization:

GRUPO EMPRESARIAL LAS AMERICAS shall adopt all necessary measures to save records of the authorization the group obtained from the owners de personal data the group shall be processing.

4.6.3. Events in which a personal data authorization is not required from the owners of personal data:

The authorization of the owners de personal data shall not be necessary in the following cases:

- Information is required by a public or administrative body in use of its legal faculties or by a court order.
- Data are of a public nature.
- Data Processing is authorized by the law for historical, statistical or Scientific Purposes.
- Personal data is related to people's Vital Statistics. (Excluding biometric data as sensitive data).

4.6.4. Privacy notice:

This privacy notice is available in the corporate group's webpage at www.lasamericas.com.co.

4.6.5. Revoking Authorizations:

Owners of personal data may revoke their consent to the processing of their personal data at any time as long as it does not hinder any legal provision. Owners of personal data must clearly ask if revoking their authorization refers to all the purposes agreed on at first; that is, that the party responsible for processing the information must cease to use the owners' data entirely, or if this revoking of their consent falls upon certain types of determined processing.

With the second modality, that is, a partial revoking of a consent, other purposes of data processing are kept safe and the party responsible for processing may conduct processing in accordance with the authorization granted and the processing the owners of the data agreed on.

In view of the above, it shall be necessary for the owners of the personal data to indicate to the party responsible for processing in a statement if revoking their consent is total or partial. In the second case, owners of the data must indicate with which processing they are not satisfied.

4.7. NATIONAL DATABASE REGISTRY (IN SPANISH, REGISTRO NACIONAL DE BASES DE DATOS - RNBD)

In events contemplated in the law, GRUPO EMPRESARIAL LAS AMERICAS reserves the faculty to save and catalog determined data found in its databases as confidential pursuant to prevailing norms and company policies.

GRUPO EMPRESARIAL LAS AMERICAS shall proceed to file its databases, before the National Database Registry (In Spanish, Registro Nacional de Bases de Datos - RNBD) in accordance with prevailing norms and regulations which the National government has issued for such purposes. The record shall be managed by the Superintendence of Industry and Business (In Spanish, Superintendencia de Industria y Comercio). The National Database Registry is the public directory of databases subjected to processing which operates in the Colombia, and it shall be readily available for citizens to access and consult freely in accordance with norms the national government has issued for such purpose.

4.8. INTERNATIONAL DATA TRANSFER OR DATA BROADCASTS

To transfer and broadcast owners' personal data internationally, GRUPO EMPRESARIAL LAS AMERICAS shall take the required measures so that third parties may know and commit to observing this policy.

To transfer personal data, the following rules shall apply: international personal data transfers must observe what is set forth in article 24 of Law 1581 of 2012; in other words, a prohibition to transfer personal data to countries that do not provide suitable levels of data protection and in exceptional cases to countries that do not apply said prohibition.

International personal data broadcasts made from a party responsible for the data and a party in charge of the data to allow the latter to process on behalf of the former do not need to be informed to the owners of the personal data and do not need their consent when there is a contract as set forth in article 25 of Law 1581 of 2012.

4.9. TERM

The term is the effective date of the personal data processing policy of the databases.

This data processing policy's effective date is July 27, 2013, and it shall be in effect as long as it is not modified by legal provisions.

Any substantial change in this data processing policy shall be promptly and effectively communicated to the owners of the personal data before implementing new policies.

5. REFERENCES

Colombian Political Constitution, article 15
Company Bylaw 1581 of October 17, 2012.
Decree 1377 of June 27, 2013.
Decree 886 of May 13, 2014

6. ATTACHMENTS

- Privacy notice
- Authorization for data processing
- Procedure to register in the national database
- Comprehensive personal data management program