

COLOMBIA ANNEX
PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. Applicable Regulations

GHL is committed to complying with the regulations in force in Colombia regarding the protection of personal data, through a program established in order to have appropriate, effective and verifiable measures (Demonstrated Responsibility), below are the main regulations that have been linked to our policies and manuals:

- Article 15 of the Political Constitution of Colombia
- Law 1581 of 2012
- Regulatory decrees:
 - o Decree 1377 d 2013
 - o Decree 1074 of 2015

2. Responsible (owner) of the Personal Data Bank

- Holding Hotelera GHL SAS
 - o NIT: 901580112 2
 - o Central Office: Calle 72 # 6-30, Bogotá – Colombia
 - o Telephone: +57 3139333
- OPCO SAS
 - o NIT: 90159009 3
 - o Central Office: Calle 72 # 6-30, Bogotá – Colombia
 - o Telephone: +57 3139333

3. Definitions

Transmission: Processing of Personal Data that involves the communication of the same to a third party, when said communication has the purpose of carrying out a Processing by the Data Processor in the name and on behalf of the Data Controller, to comply with the purposes of the latter.

Notice of Privacy: Means the verbal or written communication generated by the Controller and addressed to the Owner of Personal Data, through which he or she is informed of the existence of the Personal Data Processing Policy, which will be applicable, the way to access it and the purposes. of the Processing of Personal Data.

Processing of Personal Data of girls, boys and/or adolescents: GHL will Process the Personal Data of a minor under 18 years of age, provided that there is prior, express and informed consent from parents or legal guardians. In these cases, parents or legal guardians may change or revoke the Authorization as described in this Policy.

4. Attention to Requests, Queries and Claims:

The quality assurance area is the area in charge of processing the owners' requests to make their rights effective.

5. Response time for queries or requirements

The query will be answered within a maximum period of ten (10) business days from the date of receipt. When it is not possible to attend to the query within said term, the interested party will be informed, expressing the reasons for the delay and indicating the date on which their query will be attended to, which will not exceed five (5) business days following the expiration of the first term. GH L will respond to the requirements within a maximum period of fifteen (15) business days from the day following the date of receipt. When it is not possible to attend to the request or claim within said term, GH L will inform the interested party of the reasons for the delay and the date on which the request or claim will be attended to, a date that will not exceed eight (08) business days following the expiration of the foreground.

6. Validity and changes

This Annex to the personal data processing policy is approved on May 22, 2024, the date from which it is applicable.

This Policy may be modified by GH L when required without prior notice, provided that they are non-substantial modifications. Otherwise, they will be previously communicated to the Owners.