




MAOALRL01

**PRIVACY AND PERSONAL DATA
PROTECTION POLICY**

Documentary Control

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1. Generalities

Target

The objective of this Privacy and Data Protection Policy (hereinafter "Policy"), is to comply with the regulations that govern Protection of Personal Data in Colombia and Mexico, or those that complement, substitute, modify or repeal them and in particular, guarantee the right of Habeas Data of the owners of personal data.

Responsible

- Principal Personal Data Protection Officer at the level of Hada Group
- Substitute Personal Data Protection Officer designated by each company
- Responsible for the databases
- Operatives

2. Description of activities

2.1 Scope

This Policy is applicable to Hada S.A., Hada International S.A. Hadatech SAS y Cosméticos Trujillo S.A. de C.V. (hereinafter "Hada Group Companies") as responsible of the treatment and to their direct and indirect employees, as well as to all those third parties, natural or legal, to whom they transmit or transfer personal data of the groups of interest of the responsible of the treatment, when they perform any treatment on them.

Hada S.A.

Residency Manizales, Colombia

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Contact hada@hada.com.co

Hada International S.A.

Residency Barranquilla, Colombia

Address Zona Franca La Cayena Km 8 Lote 7

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Hadatech SAS

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Cosméticos Trujillo S.A. de C.V.

Residency México

Address Antoine Lavoisier 24, Parque Ind. Cuamantla, Cuautitlan Izcalli Edo Mex C.P. 54730

Contact cosmeticostrujillo@hadamexico.com

2.2 Definitions

For the purposes of this Policy, it will be understood by

2.2.1 Adolescent

People between 12 and 18 years of age.

2.2.2 Authorization

Prior, express and informed consent of the personal data owner to carry out the treatment of their personal data, which can be collected in a (i) written, (ii) oral or (iii) way through unequivocal behaviors, which allow reasonably conclude that it granted the authorization.

2.2.3 Privacy notice

Physical, electronic document or in any other format generated by the responsible of the treatment, which is made available to the owner for the treatment of their personal data. In the privacy notice, the owner is informed of the information regarding the existence of the information processing policies that will be applicable, the way to access them and the characteristics of the treatment that is intended to be given to the personal data.

2.2.4 Database

Organized set of physical or electronic (digital) personal data that is subject to manual or automated treatment.

2.2.5 Personal data

Any information linked or that may be associated with one or more specific or determinable natural persons. The nature of Personal Data can be public, semi-private, private or sensitive.

2.2.6 Private data

It is the data that due to its intimate or reserved nature is only relevant for the owner.

2.2.7 Public data

It is the data classified as such according to the mandates of the law or the Political Constitution and that which is not semi-private, private or sensitive. The data relating to the marital status of individuals, their profession or trade, their status as a merchant or public servant and those that can be obtained without any reservation are public, among others. By its nature, public data may be contained, among others, in public records, public documents, gazettes and official gazettes, which are not subject to reservation.

2.2.8 Sensitive data

Are those that affect the privacy of the personal data owner or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions, organizations social, human rights or that promotes the interests of any political party or that guarantee the rights and guarantees of opposition political

parties as well as data related to health, sexual life and biometric data (fingerprint, iris of the eye, voice, way of walking, palm of the hand or facial features, photographs, videos, among others). To the personal data of boys, girls and/or adolescents, the same rules and procedures will be applied as to sensitive data, and no treatment will be given that may violate or threaten their physical, mental and emotional development.

2.2.9 Semi-private data

They are those that do not have an intimate, reserved, or public nature and whose knowledge or disclosure may be of interest not only to its owner, but to a group of people or society in general. Semi-private data is understood, among others, as information related to social security and financial and credit behavior.

2.2.10 Right of Hábeas Data

It is the right that all people have to know, update and rectify the information that has been collected about them in data banks and in archives of public and private entities.

2.2.11 Manager of the treatment

Natural or legal person, public or private, that by itself or in association with others, carries out the Treatment of Personal Data on behalf of the Responsible of the Treatment.

2.2.12 Groups of interest

For the purposes of this Policy, interest groups shall be understood as all groups of natural persons with respect to which the responsible of treatment and/or those in charge of treatment carry out any personal data processing.

2.2.13 Boy or girl

People between 0 and 12 years old.

2.2.14 Personal data protection officer

Person or area responsible for ensuring that the PQRSD that are presented regarding the protection of personal data, are addressed, and ensuring that the policies, guidelines and procedures that make up the Personal Data Protection Program are complied with. For the purposes of this Policy, a principal personal data protection officer and substitute data protection officers will be appointed. The main data protection officer will be designated in this Policy. The substitute data protection officers, will be appointed by means of a private document from the Hada Group Companies.

2.2.15 PQRSD

Requests, complaints, queries, suggestions and claims regarding the protection of personal data.

2.2.16 Data protection

Are all the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

2.2.17 Responsible of the treatment

Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the treatment of the data.

2.2.18 Owner

It is the natural person whose personal data is subject to treatment.

2.2.19 Transfer

The data transfer takes place when the responsible of the treatment and/or the manager of the treatment of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is responsible of the treatment and is inside or outside from the country.

2.2.20 Transmission

Treatment of personal data that implies its communication within or outside the territory of the responsible of the treatment, when it is intended to carry out a treatment by the manager of the treatment on behalf of the responsible of the treatment.

2.2.21 Treatment

Any operation or set of operations on personal data, such as the collection, storage, updating, use, circulation, Transfer, Transmission or deletion.

2.3 Guideline principles

The following are the guiding principles regarding the protection of personal data, and they will apply to the Treatment carried out by the responsible of the treatment, their employees and all those natural or legal third parties to whom they transmit or transfer personal data of the owners, when they carry out any treatment on them:

2.3.1 Legality Principle

The treatment of personal data will be carried out in accordance with the legal requirements established in the applicable current regulations.

2.3.2 Purpose Principle

The processing of personal data must obey a legitimate purpose in accordance with the constitution and the Law, which must be informed to the owner.

2.3.3 Freedom Principle

The Treatment can only be carried out with the prior, express and informed consent of the owner. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves consent. Public Data are excepted from this principle, which may be subject to Treatment without requiring authorization from the owner, in accordance with the provisions of current regulations.

2.3.4 Veracity or Quality Principle

The information subject to treatment must be true, complete, exact, updated, verifiable and understandable. Processing of partial, incomplete, fractioned or misleading data is prohibited.

2.3.5 Transparency Principle

In the treatment, the right of the owner to obtain at any time and without restrictions, information about the existence of data concerning him must be guaranteed.

2.3.6 Limited Access and Circulation Principle

Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the owners or authorized third parties.

2.3.7 Security Principle

The information subject to treatment must be protected through the use of technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

2.3.8 Confidentiality Principle

All persons who intervene in the processing of personal data are obliged to guarantee the reservation of the information, even after the end of their relationship with any of the tasks that the treatment comprises.

2.4 Treatments and purposes to which the personal data will be submitted

For the purposes of this Policy, the responsible of the treatment directly or through managers of the treatment, may collect, store, use, circulate, update, delete or carry out any other type of manual or automated treatment on the personal data of their groups of interest, adjusting at all times to the provisions of current regulations and for the purposes described below

2.4.1 General purposes for the processing of personal data of all groups of interest

- Identification of the owners.
- National and international transmission and transfer and storage and custody of information and/or personal data in physical files or own servers and/or third parties, located inside or outside the country, in countries considered safe or secure by the Superintendency of Industry and Commerce, and in countries that are not safe or secure, as long as it is required for the development of the company's own activities and relations with the different groups of interest.
- Preservation of information for historical, scientific and statistical purposes.
- Guarantee the exercise of any right of the owners, their employers or contractors.
- Registration and control of the entry and exit of documents.
- Analysis and development of programs that generate a social impact for the groups of interest of the responsible of the treatment.

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- Announcement and execution of programs, meetings, trainings and events, as well as the preservation of documentary records of the same, such as attendance lists, photographs, voice recordings and/or videos, which may be used for internal or external publications, websites, social networks, reports, emails, among others.
 - Preparation and implementation of surveys and interviews.
 - Sending communications related to the purposes contained in this privacy policy, the activities of the responsible of the treatment or strategic allies, advertising, marketing, promotions, events, marketing and promotion of products and/or services, content updates in the websites, alliances and benefits, through the professional, business and/or personal contact information of the owners, including, but not limited to, landline and/or mobile phone, physical and/or electronic mail, SMS text messages and/or mms, chats, social networks, electronic media and/or any other means of communication.
 - Campaigns to update the data of the owner, his employer or contractor.
 - Controls, statistics and history of the relationships maintained with the owners.
 - Internal indicators.
 - Information systems administration, password management, user administration, among others.
 - Creation and administration of users and passwords to enter the different applications, web pages, technological and computer equipment of the responsible of the treatment and email accounts.
 - Creation and control of access and modification of documents, implementation of security measures and restriction of access to databases and information in general.
 - Basis for decision making.
 - Registration and control of access and entry to the facilities of the responsible of the treatment through video surveillance, fingerprint markings, photograph of the owner's face, verification of affiliation to ARL or EPS and the delivery of a card containing the identification data of the owner, to guarantee the security of the facilities and of the people who enter them, probative material, control of schedules and for emergency care.
 - Compliance with national and international norms and standards, including, but not limited to BASC, SAGRILAFT and OEA.
 - Support in internal and/or external audits, tax audits, consultancies and implementation of improvement plans.
 - Compliance with current regulations.
 - Reports to competent administrative and judicial authorities.
 - Attention to requests made by competent administrative and judicial authorities.
 - Preparation and presentation of claims and complaints before the competent authorities, as well as exercising the right of defense in any administrative and/or judicial process.
 - Compliance with the obligations derived from the contracts signed between the responsible of the treatment and the owners, or with their contracting parties or employers.
 - Internal or external communications.
 - Financial and accounting management, creation of third parties, and registration in the databases of the responsible of the treatment.
 - Tax management and generation of tax information.
 - Design, preparation and implementation of the plan or operational development of the organization.
 - Verification of data and references.
 - Verification of legal, technical and/or financial requirements.
 - Request and verification of judicial, administrative and/or disciplinary records.
 - PQRSD care or attention.
 - Issuance of certificates that certify the relationship between the responsible of the treatment and the owner, his employer or contractor.
 - Issuance of policies and insurance and concession of financial services.
 - Purposes indicated in the authorization granted by the owner and/or in the privacy notices.

2.4.2 Purposes for the processing of personal data of applicants, active and inactive, direct and indirect employees, practitioners, apprentices, beneficiaries and families

- Collection of resumes directly from the owner or from third natural or legal persons who send them, either independently, or by commission of the responsible of the treatment.
- Management and employment promotion, development of the selection process, analysis of resumes, validation of work and/or personal references, study of polygraph, interviews and certificates of occupational aptitude, graphological, psychotechnical and skills tests that are required.
- Preservation of resumes and results of the selection processes for future personnel hiring processes and/or for compliance with current legal regulations.
- Labor relationship, subscription of employment contracts.
- Induction and reinduction process.
- Expedition of owner's company ID card process.
- Control of contract renewal.
- Entry and schedule control by fingerprint markings.
- Work scheduling and assignment of functions, roles and profiles associated with the position held.
- Register of information on active and inactive direct and indirect employees, pensioners and their families, for the development of affiliation and payment of social security and parafiscal, payroll, legal and non-legal bonuses, vacations, recognition of pension rights and settlements.
- Climate, organizational culture and well-being activities, for direct and indirect employees and their families.
- Management of permits, licenses and authorizations.
- Disciplinary processes, management of sanctions, reprimands, calls for attention, discharge and dismissal with or without just cause.
- Record of disciplinary history.
- Fulfillment of the obligations of the responsible of the treatment, by virtue of the current legal regulations.
- Training and education for direct and indirect personnel.
- Skills and performance evaluations.
- Discounts on salary allowed in current regulations and practice and registration of embargoes at the request of the competent authority.
- Delivery of endowments and fixed assets.
- Review of documents for retirement of severance pay.
- Contracting with third parties for services that benefit direct and indirect employees, beneficiaries and families.
- Compliance with current regulations on health and safety at work SG-SST, including, but not limited to: collection and analysis of health information and socio-demographic profile of active and inactive direct and indirect employees, research and indicators of absenteeism, incidents and accidents, occupational medical evaluations, evaluation of disabilities, reasons and recurrences, reincorporation and/or job readjustment, implementation and follow-up of recommendations made by the occupational physician, EPS and/or ARL, qualification processes for diseases and accidents of work, road safety, report and investigation of incidents and accidents at work, inspections and studies of the workplace, verification of the use of protective elements, identification of hazards and evaluation of unsafe behaviors, processes of observation of safe behaviors and monitoring of commitments.
- Provision of information to contractors and suppliers, for the execution of the contracts signed between them and the responsible of the treatment.
- Creation and control of access and modification of documents.

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- Processing of disabilities or licenses before the corresponding entities.
 - Identification and monitoring of income and expenses of personnel, payroll and promotions.
 - Advertising of the responsible of the treatment and/or of strategic allies in any means of communication, as well as publication of editorial content, blogs or management and/or sustainability reports, among others, that contain personal information of the owners including photographs, with the indication of the position they hold and their name, or the relationship with any collaborator of the organization.
 - Transfer of proof of payment of contributions to the social security and parafiscal system and proof of training carried out to collaborators, sent to the contractors of the person responsible of the treatment, when required for the payment of goods and/or services provided by the latter in quality of contractor and/or supplier.
 - Publication of employee status by any means of communication, including, but not limited to, contracts, forms of relationship with clients, financial entities and/or contractors and/or suppliers, email, among others.

2.4.3 Purposes for the processing of personal data of clients and prospects, users and/or distributors and their collaborators and/or national and international shareholders

- Clients', users' and/or distributors' employee information.
- Analysis of behavior, profiles and market segmentation.
- Marketing and remarketing.
- Offer of goods and/or services of the responsible of the treatment and/or its strategic allies.
- Statistical studies of commercial, financial and credit risk behavior.
- Approval and renewal of credit quota.
- Own and partners or shareholder's patrimonial information, to support or guarantee the payment of credit quotas.
- Consultations and report of positive and negative commercial, financial and credit information to operators or administrators of databases, financial and credit entities, commercial information agencies and legally established risk centers.
- Subscription and execution of contracts.
- Management of national and international logistics.
- Transport.
- Inventory control.
- Compliance with legal and contractual obligations.
- Billing.
- Portfolio recovery management through persuasive, extrajudicial and/or judicial collection.
- Identification of debtors and co-debtors.
- Management of clients and/or users.
- Management of social networks.
- Customer and/or user loyalty, including but not limited to promotional activities, discounts and benefits.
- Generation of incentives for distributors and their collaborators.
- History of commercial relationships.
- Sending of advertising, trade marketing, artificial intelligence, opinion polls, commercial prospecting, distance selling and electronic commerce.
- Transmission and transfer of contact data to managers of the treatment, contractors and suppliers, other clients and/or strategic allies, so that they process the personal data of the owner, for the purposes indicated in this privacy policy.
- Evaluation of the quality of the goods and/or services provided by the responsible of the treatment.

2.4.4 Purposes for the processing of personal data of contractors and suppliers and their collaborators and/or national and international shareholders

- Contractor and/or supplier's employee information.
- request, collection and analysis of quotes and/or offers.
- Invitations to participate in contracting processes.
- Development of contracting processes.
- Request for references and third party certificates.
- Subscription and execution of contracts and/or issuance of purchase orders and/or service orders.
- Contract administration.
- Inventory control.
- Training, if required for the execution of the contract.
- Compliance with legal and contractual obligations.
- Management of national and international logistics.
- Payment management.
- Evaluation of contractors and suppliers.
- Calls for attention, sanctions or exclusions.
- Schedule control, in case of contracting services or tasks with contractually defined schedules.
- Technical consultations on products offered by suppliers.
- Contact with suppliers and contractors or their collaborators, for the development of the signed contracts or issued service orders and/or purchase orders.
- Verification of compliance with legal, technical and experience requirements.
- Verification of the payment of salaries and social benefits of contractors and suppliers and their collaborators.
- Programming of technical activities and confirmation its execution.
- Management of quality claims for products or services.
- Billing management in case of losses or deviations in contracts.
- History of commercial relationships.
- Advertising in any media.

2.4.5 Purposes for the processing of personal data of shareholders and families

- Convocation and execution of assemblies, raising and recording of minutes.
- ending information related to the activities of the person responsible of the treatment.
- Guarantee the effective exercise of the shareholders' rights.
- Payment of dividends or profits.
- Capitalizations.
- Contracting with third parties' services that benefit shareholders.
- Invitation to events.
- Publication of the quality of shareholder, including, but not limited to, forms of relationship with clients, insurers, financial entities and/or contractors and/or suppliers, among others.
- Use of information for advertising and communication media.
- Accompaniment in the preparation and presentation of shareholder's' tax returns.

2.4.6 Purposes for the processing of personal data of board of directors' members

- Election of main and alternate members.
- Sending information related to the activities of the responsible of the treatment.
- Convocation and execution of board of directors' meetings, gathering and recording of minutes.
- Payment of fees.
- Publication of the quality of member of the board of directors, including, but not limited to, forms of relationship with clients, insurers, financial entities, contractors and/or suppliers, among others.

2.4.7 Purposes for the processing of personal data of officials of state entities, certifying entities and associations, among others

- Relationship and communication through business and professional contact details.

2.5 Rights of the owner

The following are the rights of the owners of personal data:

- Know, update and rectify personal data before the responsible of the treatment or managers of the treatment. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or those whose treatment is expressly prohibited or has not been authorized.
- Request proof of the authorization granted to the responsible of the treatment, except when expressly excepted as a requirement for the treatment.
- Be informed by the responsible of the treatment or the manager of the treatment, upon request, regarding the use that has been given to the owners' personal data.
- File complaints for infractions of the provisions of current regulations before the competent authorities (in Colombia, the Superintendency of industry and commerce).
- Revoke the authorization and/or request the deletion of the data when in the treatment the principles, rights and constitutional and legal guarantees are not respected.
- Free access to personal data that have been subject to Treatment.

The request to delete the information and revocation of the authorization will not proceed when the owner has a legal or contractual duty to remain in the database.

2.6 Duties of the responsible of the treatment

It is the duty of the responsible of the treatment:

- Guarantee the owner, at all times, the full and effective exercise of the Habeas Data Right
- Request and keep by any means and under the conditions provided in current laws, a copy of the respective authorization granted by the owner.
- Properly inform the owner about the purpose of the collection of personal data and the rights that assist him by virtue of the authorization granted.
- Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.

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- Guarantee that the information provided to the manager of the treatment is true, complete, accurate, updated, verifiable and understandable.
 - Update the information, communicating in a timely manner to the manager of the treatment, all the news regarding the data previously provided and adopt the other necessary measures so that the information provided is kept updated.
 - Rectify the information when it is incorrect and communicate the pertinent to the manager of the treatment.
 - Provide the manager of the treatment, as the case may be, only data whose treatment is previously authorized in accordance with current regulations.
 - Require the manager of the treatment, at all times, to respect the security and privacy conditions of the owner's information.
 - Process PQRSD formulated in the terms indicated in current regulations.
 - Adopt an internal manual of policies and procedures to guarantee adequate compliance with current regulations, especially for the attention of PQRSD.
 - Inform the manager of the treatment when certain information is under discussion by the owner, once the claim has been submitted and the respective process has not been completed.
 - Inform at the request of the owners about the use given to their data.
 - Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the owners.
 - Comply with the instructions and requirements issued by the competent authorities in the matter.

2.7 Duties of the manager of the treatment

It is the duty of the manager of the treatment:

- Comply in the development of the contracted activities, with this policy, as well as with all those procedures, guides and/or guidelines issued by the responsible of the treatment in terms of personal data protection.
- Adopt, according to the instructions of the responsible of the treatment, all technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Implement a personal data protection policy that complies with the provisions of the rules that regulate the matter.
- Treat personal data in accordance with the instructions expressly received from the responsible of the treatment, refraining from using them for purposes other than those contracted.
- Refrain from supplying, assigning or marketing personal data with natural or legal, public or private third parties, unless it is of public nature without subject to reservation, or is required by a competent authority in the exercise of its legal functions.
- Keep strict confidentiality regarding the personal data to which the manager of the treatment has access in the exercise of the contracted activities, as well as to diligently comply with the duty of guardianship and custody over the data throughout the term of the contract, and even after the termination has occurred.
- Access or consult the information or personal data that rest in the databases of the responsible of the treatment only when it is strictly necessary for the exercise of the contracted activities.
- Report to the responsible of the treatment immediately upon its materialization or at the moment in which they come to their knowledge, through the channels and means established by it, any incident or threat of incident that affects or may affect directly or indirectly the protection of personal data.

- Guarantee at all times, the full and effective exercise of the Right to Habeas Data of the owners, as well as due process in the event of PQRSD being presented in the field of personal data protection.
- Timely update, rectify or delete the data in the terms of current regulations.
- Update the information reported by the responsible of treatment, within five (5) business days from its receipt.
- Adopt an internal manual of policies and procedures to guarantee adequate compliance with current regulations, especially, for the attention of PQRSD presented by the owners.
- Refrain from circulating information that is being contradicted by the owner and whose blocking has been ordered by the competent authority.
- Allow access to information only to people who can have access to it.
- Comply with the instructions and requirements issued by competent authorities.
- In case of collecting data on behalf of the responsible of the treatment, require the authorization of the owners, in the cases in which it is required, in accordance with current regulations.

2.8 Personal data protection officer

The person who will exercise the functions of personal data protection officer will be the administrative and financial vice president, who will ensure, among others, the adequate guarantee of the rights of the owners, especially the attention of PQRSD.

2.9 Procedure so that the owners of the information can exercise their rights

The owners or those persons who are legitimized by current regulations can present PQRSD through the following channels:

Hada S.A.	hada@hada.com.co
Hada International S.A.	
Hadatech SAS	
Cosméticos Trujillo S.A. de C.V.	cosmeticostrujillo@hadamexico.com

The following are the persons empowered to present PQRSD:

- The owner, who must prove his identity sufficiently.
- The successors in title of the owner, who must prove such quality.
- The owners' representative and/or attorney-in-fact, prior accreditation of the representation or power of attorney.
- By stipulation in favor of another or for another, provided that there is acceptance by the owner, of which evidence must be submitted in the application.

The rights of Boys, Girls or Adolescents shall be exercised by the persons who are empowered to represent them.

Complaints, queries, suggestions and claims will be resolved within fifteen (15) business days following their presentation by the owner or legitimate person. The terms established here will begin to run on the business day following the presentation.

Requests must be resolved within ten (10) business days following their presentation by the owner or authorized person. The terms established here will begin to count on the same day of presentation, unless it is presented on non-business days. In the latter case, the terms will take effect on the first business day following the presentation.

2.10 Validity

The first version of the Privacy Policy became effective from June 1, 2018. This updated version, socialized with the board of directors of Hada S.A. and Hada International S.A. and approved according to Acts No. 775 and 109, respectively, is effective as of April 30, 2021.

The databases subject to treatment by the responsible of the treatment, will be in force while the purposes for which the data was collected subsist and/or the term established by law.

The responsible of the treatment reserves the right to modify this privacy policy at any time. In the event of substantial changes in the content, in relation to the identification of the responsible of the treatment and the purpose of the processing of the personal data, which may affect the content of the authorization, the responsible of the treatment will communicate these changes to the owner. before or at the latest at the time of implementing the new policies and will require a new authorization when the change refers to the purpose of the treatment.