

Personal Data Processing Policy and Privacy Notice

Purpose

The Corporation for the Development of Energy Policies for Just Transitions (POLEN Transiciones Justas), identified with Tax ID No. 901661923-7 (hereinafter “POLEN TJ”), has prepared this Personal Data Processing Policy (hereinafter the “Processing Policy”) for employees, contractors, candidates, and third-party natural persons (hereinafter the “Data Subject”) in order to define any operation involving personal data, such as the collection, storage, use, circulation, or deletion of information linked to, or that may be linked to, one or more identified or identifiable natural persons (hereinafter “Personal Information”), in compliance with Law 1581 of 2012, Decree 1377 of 2013, and Decree 1074 of 2015.

POLEN TJ shall process Personal Information for the purpose of processing, as defined below, and in accordance with the principles and provisions set forth in the applicable regulations.

Accordingly, this Processing Policy establishes the principles, conditions, and procedures to ensure the protection of Personal Information, in alignment with the principles of purpose limitation, freedom, truthfulness or quality, legality, transparency, restricted access and circulation, security, confidentiality, and demonstrated accountability.

Definitions

Authorization: Prior, express, and informed consent granted by the Data Subject to carry out the processing of their personal data.

Database: An organized set of personal data subject to processing, regardless of its method of storage, organization, or access.

Personal Data: Any information linked to, or that may be associated with, one or more identified or identifiable natural persons.

Sensitive Data: Information that affects the privacy of the Data Subject or whose improper use may lead to discrimination, such as data concerning health, sexual orientation, religious or political beliefs, among others.

Data Processor: A natural or legal person who processes personal data on behalf of the Data Controller.

Data Controller: A natural or legal person who decides on the collection and purposes of personal data processing.

Data Subject: The natural person whose personal data is subject to processing.

Processing: Any operation or set of operations involving personal data, such as collection, storage, use, circulation, or deletion.

LEGAL BASIS

Regulation	Publication Date	Description
Political Constitution of Colombia - Article 15	1991	Recognizes the fundamental right to habeas data, guaranteeing the right to know, update, and rectify personal information contained in databases.
Law 1266	2008	Regulates the handling of financial, credit, commercial, and services-related information, establishing principles for the protection of personal data in this area.
Law 1581	2012	Establishes general provisions for the protection of personal data, setting out principles, rights, and obligations applicable to data controllers and processors.
Decree 1377	2013	Partially regulates Law 1581 of 2012, particularly in relation to authorization for the processing of personal data collected before the law was enacted.
Decree 886	2014	Regulates aspects related to the registration of databases in the National Database Registry (RNBD).
Single Circular of the Superintendence of Industry and Commerce (SIC)	In force	Defines guidelines and compliance criteria on personal data protection, including reporting obligations and security measures.

Collection of Personal Information

POLEN TJ may collect the following categories of Personal Information:

For candidates and employees

- a) Personal and family information: Information that includes, but is not limited to, name, including any previous names; photographs or images taken by POLEN TJ or provided by the Data Subject; contact information, including address, telephone number, and email address; date and place of birth; gender; citizenship identification number, professional license number, and other government-issued identification numbers; bank account number and other financial data; marital and family status; passports; visas; criminal records; personal and employment references; academic certificates; information about family members and dependents, including name, date of birth, and relationship to the Data Subject; and name, address, and telephone number of an emergency contact.
- b) Employment and contractual information: Information that includes, but is not limited to, previous employment; position or role; location; address and telephone number of the workplace; employment start and end date; name of the immediate supervisor; company organizational chart or chain of command; nature of employment, whether full-time or part-time; salary; bonuses; information on employment benefits; job performance and other information related to the evaluation of the Data Subject; payroll or remuneration payment information; records of vacation, absences, leave, and medical leave; education and information related to training, professional development, certificates, and job-related competencies.
- c) Sensitive information: Biometric data, such as fingerprints, photographs, videos, and voice recordings; medical and occupational health information; membership in trade unions or social organizations; socioeconomic status; racial or ethnic origin; information related to work-related disabilities for benefits management purposes; and information related to health status.

For natural-person suppliers, including contractors, or their natural-person representatives

- a) Personal Information: Information that includes, but is not limited to, name, including any previous names; photographs or images taken by POLEN TJ or provided by the Data Subject; contact information, including address, telephone number, and email address; citizenship identification number; Single Tax Registry; tax identification number; social security contribution payment form; information regarding remuneration and/or fees;

bank account number and other banking and financial data; passports; visas; criminal records; commercial and employment references; and other service provision or employment relationships of the Data Subject of which the Organization is aware.

- b) Employment information: Information sent to or shared with POLEN TJ by the Data Subject or by a duly authorized third party; information consulted through databases on platforms where the Data Subject has published their Personal Information, including, but not limited to, previous employment, position or role, employment start and end date, and name of the immediate supervisor.

For third-party natural persons or their natural-person representatives

- a) Personal Information: Information that includes, but is not limited to, name, including any previous names; photographs or images taken by POLEN TJ or provided by the Data Subject; contact information, including address, telephone number, and email address; citizenship identification number; Single Tax Registry; tax identification number; bank account number and other banking and financial data; visas; and criminal records.

For attendees of events organized or managed by POLEN TJ

- a) Personal Information: Information that includes, but is not limited to, name, including any previous names; videos, photographs, or images taken by POLEN TJ or provided by the Data Subject; contact information, including address, telephone number, and email address; citizenship identification number; EPS and ARL affiliation data; Single Tax Registry; tax identification number; and information related to health status.

Purpose of Personal Information Processing

POLEN TJ may use the Personal Information described above for the following purposes (hereinafter the "Purpose of Processing"):

For candidates

- (1) To evaluate them as potential employees of POLEN TJ; (2) to assess and verify the information contained in their résumé and the information regarding professional experience and academic background provided by the Data Subject; (3) to store and classify their Personal Information in order to facilitate access and identify them; (4) to provide information to competent authorities when required by such authorities in the exercise of their legal functions and powers, in compliance with a legal duty, or to protect the rights of POLEN TJ; (5) to provide information to internal or external auditors within the framework of the purposes described herein; (6) to announce events of

interest or new calls for other job openings; (7) to verify information contained in risk lists, restrictive and non-restrictive lists, and lists that are binding and non-binding for Colombia; and all other activities compatible with these purposes.

For employees

(1) Administration and management of the contractual relationship; (2) management and processing of payroll and/or remuneration, including decisions regarding remuneration and the calculation of any bonuses, when applicable; (3) monitoring of financial and remuneration indicators; (4) preparation of budgets; (5) management of social benefits, social security affiliations for the employee and their family group, non-statutory benefits, and leave and medical leave, when applicable; (6) career planning and development; (7) provision of information to competent authorities when required by such authorities in the exercise of their legal functions and powers, in compliance with a legal duty, or to protect the rights of POLEN TJ; (8) social welfare and recreational activities; (9) management, review, and assessment of performance, when applicable; (10) facilitation of recruitment, human talent management, communication, and succession planning activities; (11) IT services, help desk, and technical support; (12) monitoring and adoption of measures to ensure compliance with POLEN TJ's policies, procedures, and other activities; (13) provision of appropriate workspaces according to each employee's needs; (14) verification of information contained in risk lists, restrictive and non-restrictive lists, and lists that are binding and non-binding for Colombia; and all other activities compatible with these purposes.

For natural-person suppliers, including contractors, or their natural-person representatives, as well as third-party natural persons or their natural-person representatives

(1) Administration, management, fulfillment, and execution of the contractual relationship with the supplier or contractor; (2) management of supplier or contractor accounts, including compliance with legal requirements related to invoicing and payment transactions and, in general, to ensure internal monitoring; (3) conducting satisfaction surveys, as well as supplier and contractor performance reports; (4) providing information to competent authorities when required by such authorities in the exercise of their legal functions and powers, in compliance with a legal duty, or to protect the rights of POLEN TJ; (5) management of invoicing, accounts receivable, collections, and payments for required services; (6) verification of information

contained in risk lists, restrictive and non-restrictive lists, and lists that are binding and non-binding for Colombia; and all other activities compatible with these purposes.

For attendees of events organized or managed by POLEN TJ

(1) To use and/or edit, in whole or in part, images, voices, and/or reactions so that they may be disclosed and/or incorporated for advertising, commercial, and institutional purposes in any communication medium or medium used to disseminate its commercial and/or advertising, audiovisual, radio, graphic, internet, social media, public-space, and/or any other media strategy, in accordance with the media plan. (2) To register and manage attendance at events, including the preparation of attendance lists; (3) to protect employees, contractors, and attendees, as well as to prevent the commission of crimes; (4) to detect possible violations of POLEN TJ policies; (5) to prevent inappropriate or improper use of the facilities where the event takes place; (6) to ensure that the systems and facilities where events are held are accessed only by authorized or expressly invited persons; (7) to conduct satisfaction studies, surveys, and data analysis to improve the attendee experience; (8) to provide information to competent authorities when required in the exercise of their legal functions and powers, in compliance with a legal duty, or to protect the rights of POLEN TJ; (9) to verify information contained in risk lists, both restrictive and non-restrictive, and lists that are binding or non-binding for Colombia; (10) to ensure the security of POLEN TJ's information and comply with applicable regulatory requirements; and (11) to carry out all activities compatible with these purposes.

Personal Information About Family Members and/or Third Parties

If the Data Subject provides POLEN TJ with Personal Information about members of their family and/or other third parties, such as emergency contacts or information for benefits allocation purposes, POLEN TJ shall inform them of their rights regarding the protection of their Personal Data and Sensitive Personal Data. Unless the Data Subject has notified POLEN TJ otherwise, the Data Subject declares that they have obtained the express, prior, and informed consent of such persons, it being understood that such persons have the legal capacity to grant authorization, to provide this information to POLEN TJ and for the resulting processing, including transmission, of such information as set forth in this Processing Policy.

Likewise, in the event that sensitive data is collected or processed, such as information on health or religious beliefs, and any other information that falls under this category according to applicable regulations in force, POLEN TJ shall request the explicit consent of the Data Subject prior to its collection or processing.

Principles for Data Processing

- **Legality:** Compliance with Law 1581 of 2012 and its regulatory provisions, as well as any other applicable regulation concerning this matter.
- **Purpose limitation:** The Processing of Personal Data and Sensitive Personal Data collected by POLEN TJ must respond to a legitimate purpose, which must be disclosed to the Data Subject.
- **Freedom:** Processing may only be carried out with the prior, express, and informed consent of the Data Subject. Personal Information, including sensitive personal data, may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that waives the requirement for consent.
- **Truthfulness or quality:** Information subject to Processing must be truthful, complete, accurate, up to date, verifiable, and understandable. The Processing of partial, incomplete, fragmented, or misleading data is prohibited.
- **Transparency:** Processing must guarantee the Data Subject's right to obtain from POLEN TJ, at any time and without restrictions, information about the existence of data concerning them.
- **Restricted access and circulation:** Personal Information, including sensitive personal data, except for public information, may not be available on the internet or other mass dissemination or communication media, unless access is technically controlled to provide restricted knowledge only to Data Subjects or authorized third parties.
- **Security:** Personal Information subject to Processing by POLEN TJ shall be protected through the use of the technical, human, and administrative measures necessary to ensure the security of records, preventing their alteration, loss, consultation, use, or unauthorized or fraudulent access.
- **Confidentiality:** All persons involved in the Processing of Personal Information are required to ensure the confidentiality of the information, including after the end of their relationship with any of the activities comprising the Processing.

Access to Personal Information

At POLEN TJ, access to Personal Information is restricted to certain persons in strictly necessary and legally permitted cases, or as required by the competent authority.

Rights of Data Subjects

In accordance with Article 8 of Law 1581 of 2012, the rights of Data Subjects of Personal Data and Sensitive Personal Data are:

- a) To know, update, and rectify their Personal Information before the data controllers or data processors within POLEN TJ. This right may be exercised, among others, with respect to partial, inaccurate, incomplete, fragmented, or misleading data, or data whose processing is expressly prohibited or has not been authorized.
- b) To request proof of the authorization granted to the data controller, except where such authorization is expressly exempted as a requirement for processing.
- c) To be informed by the data controller or data processor, upon request, regarding the use made of their Personal Information.
- d) To file complaints before the Superintendence of Industry and Commerce for violations of the law regarding the processing of Personal Information.
- e) To revoke the authorization and/or request the deletion of data that is part of the Personal Information when the processing does not respect constitutional and legal principles, rights, and guarantees. Revocation and/or deletion shall proceed when the Superintendence of Industry and Commerce has determined that, in the processing, the controller or processor has engaged in conduct contrary to the Law and the Constitution.
- f) To access, free of charge, their Personal Information that has been subject to processing.

Procedure for Exercising Rights

POLEN TJ shall process any inquiry or complaint related to the Personal Information collected and processed in accordance with the Law. To do so, Data Subjects must send a written description of their inquiry or complaint to: info@polentj.org.

Transmission of Personal Information

POLEN TJ may transmit Personal Information to third parties located in Colombia or abroad, who shall process it on behalf of POLEN TJ and in accordance with the purpose of processing indicated in this Processing Policy. Such third parties shall act as

processors of the Personal Information, and the relationship shall be documented through a data transmission agreement.

POLEN TJ shall take the necessary measures to ensure adequate information security and protection requirements by such recipients, and shall ensure that the Personal Information is duly protected in accordance with this Processing Policy and the applicable legal provisions.

Authorization and Consent

POLEN TJ shall request authorization from Data Subjects through one or more of the following means:

- Checkboxes in physical or digital forms.
- Written consent in physical documents.
- Confirmations via email.

All authorizations shall be recorded and retained for future consultation.

Privacy Notice

POLEN TJ informs that the personal data collected shall be processed in accordance with Law 1581 of 2012 and its regulatory provisions. To learn more about our data processing policy and exercise your rights, please consult [\[link to the policy\]](#).

This notice shall be published on:

- POLEN TJ's official website.
- Physical and digital forms.
- Initial contact emails with data subjects.
- Institutional social media channels, when necessary.

Term and Amendments

This Processing Policy shall enter into force as of April 1, 2026, and may be amended in response to regulatory changes or institutional needs. Amendments shall be communicated to Data Subjects through the available contact channels.