

GRUPO SURA's DATA PROTECTION POLICY

Grupo de Inversiones Suramericana S.A., hereinafter referred to as Grupo SURA, in compliance with that stipulated in Statutory Law 1581 of 2012 as well as in Regulatory Decree 1377 of 2013, has officially adopted this Personal Data Protection Policy, for the purpose of protecting the information obtained from its shareholders, investors, suppliers, service providers, employees and any other private individual who comes into contact with Grupo SURA, so as to ensure that they are able to exercise their inherent rights.

The purpose of this document is to set out the procedures required for handling all personal data contained in Grupo SURA's databases, whether in digital or hard copy form, which shall be duly registered before the Colombian National Registry of Databases.

Grupo SURA guarantees people's right to privacy, while preserving their honor and good name intact, when processing the personal data collected from them, and therefore everything that the Group does in this sense shall be governed by the principles of legality, purpose limitation, freedom, reliability or quality, transparency, restricted access and/or movement, as well as security.

All information obtained from private individuals, as part of the different activities carried out by Grupo SURA, or information obtained through other entities who share personal data with the Company, shall be governed by these principles, and the owners of such information shall be entitled to ascertain, update and rectify this data, in accordance with the provisions of this policy.

Grupo SURA shall disseminate this Data Protection Policy amongst all its employees, and ensure that it is properly applied and updated in keeping with any new organizational changes and amendments to current legislation or other applicable provisions, which may affect that herein stipulated. This policy shall also be published on all those channels that Grupo SURA uses for the purpose of collecting personal data, ensuring that its stakeholders are clearly aware of their inherent rights with regard to the processing of their information.

The contents of this policy are listed as follows:

1. Regulatory framework.
 2. Guiding principles governing the handling of personal data.
 3. The owner's consent to the processing of his or her personal data.
 4. Exercising rights inherent to personal data.
 5. Information collected and stored by shareholders, investors, suppliers, service providers, employees and any other private individual who comes into contact with Grupo SURA.
 6. Processing sensitive data.
 7. The purpose of processing personal information.
 8. International transfers of personal data.
 9. Providing personal information to service providers.
 10. Preferences for sending information relating to Grupo SURA.
 11. Period of validity for processing personal data.
 12. Amendments to the Personal Data Protection Policy.
- Attachment: Definitions.

1. Regulatory framework

Article 15 of the Colombian Constitution stipulates that "everyone has the right to personal and family privacy and to maintaining their good name which the State shall respect and defend. *Similarly, they shall have the right to ascertain, update and rectify their information as shall have been collected and used by public and private entities to compile data bases and files.*

In collecting, processing and circulating such information, the right to freedom and other guarantees, as enshrined in the Constitution, shall be respected.

Correspondence and other forms of private communication shall be considered inviolable. These may only be intercepted, logged or recorded by means of a court order and in all those cases and based on all those terms and conditions provided by law

Based on the above, a set of rules and regulations have been introduced in both applicable legislation and case law, these aimed at ensuring the aforementioned constitutional rights. This policy shall be governed by the aforementioned article of the Statutory Law 1581 of 2012 for the Protection of Personal Data, along with

other case law definitions and considerations drawn up by the Colombian Constitutional Court.

2. Guiding principles governing the handling of personal data.

As part of Grupo SURA's legal and corporate commitment to ensuring the confidentiality of all personal information belonging to its shareholders, investors, suppliers, service providers, employees and any other private individual who comes into contact with Grupo SURA, we have laid out certain general principles governing the handling of personal information in keeping with Law 1581 of 2012 and Regulatory Decree 1377 of 2013. These principles are as follows:

Principle of legality: No personal information shall be processed without abiding by that stipulated in currently applicable regulations.

Principle of purpose limitation: When introducing personal data in digital and/or hard copy form on Grupo SURA's data bases, the principle of purpose limitation shall be duly abided by and the owner of such information shall be informed in the form of a data processing authorization clause as well as by this policy.

Principle of freedom: Grupo SURA shall only handle personal data when it is duly authorized to do so, as stipulated in Article 3 Section a) of Law 1581 of 2012 as well as Chapter II of Decree 1377 of 2013.

Principle of accuracy and quality: Grupo SURA shall make all efforts to ensure that the personal data it handles is accurate and duly updated, for which it shall employ efficient methods for updating and correcting such. Likewise, Grupo SURA shall refrain from processing any personal information when there are doubts regarding the quality or veracity of this same.

Principle of transparency: Among the different means established for the owners of personal information to exercise their inherent rights, both the holders, assignees and successors of such, shall be guaranteed, as well as any third parties that have been duly authorized by these, to access the personal data and information relating to each individual holder of such.

Principle of restricted access and movement: Grupo SURA is committed to ensuring that personal information can only be accessed by authorized persons, and its circulation shall be restricted to the purposes that have been duly authorized by the owner of such.

Principle of security: Grupo SURA shall take all those measures required from a technical, administrative and human resource standpoint, to ensure that the personal information stored on its digital or hard copy data bases is not accessed by unauthorized third parties.

3. Consent to the processing of personal data

The owner's consent to such constitutes a prerequisite for the constitutional legitimacy of its personal data processing function. This shall be a qualified consent given before the individual's personal data is handled and such express authorization must be provided beforehand, in a clear and informed manner, since the owner must not only accept that his or her personal data shall be handled, but also must be fully aware of the effects of having authorized the processing of such.

In the light of the above, in order to proceed with the processing of personal data, as contained in its databases, Grupo SURA shall have received the express, prior authorization from the owner of such information.

To ensure that this is the case, whenever any transaction gives rise to recording a private individual's personal information in Grupo SURA's data bases, and this information is made available to a third party, the corresponding authorization clause for the processing of such data, must specify the following at the very least:

- How the personal data is to be processed and why.
- A statement indicating that the answers given to the questions formulated are optional when it comes to consenting to the handling of sensitive data or information pertaining to children and adolescents.
- A statement indicating the person or area responsible for processing the information, including their physical or electronic address.
- The rights accorded to the owner of the personal data to be processed.

Should the owner of the information fail to provide his or her prior express consent, Grupo SURA shall refrain from processing such, except under the following circumstances where no such authorization is required:

- When carrying out the necessary steps in order to execute a contract signed with the owner of the information.
- When sending the information required by a government or administrative authority in performing their legal duties or as a result of a court order.

- When performing all those data processing functions authorized by law for historical, statistical or scientific purposes.
- When performing data processing functions of a public nature, or those required for civil registration purposes.

4. Exercising rights inherent to personal data.

Owners may at any time exercise the rights enshrined in Law 1581 of 2012 to ascertain, update and rectify their personal data, request proof of the authorization granted for the processing of such, be informed of the use made of his or her personal data, revoke any prior authorization given, request the deletion of his or her data when appropriate and gain access to such free of charge. In order to exercise these rights, the owners may write to the following email address: protecciondedatos@gruposura.com.co email, or send a letter addressed to Grupo SURA's Internal and Shared Service Department at the following address: Carrera 63 N° 49 A – 31, piso 1, Edificio Camacol, Medellín, Colombia.

In the event of any queries being made, Grupo SURA shall respond within a maximum term of ten (10) business days from the date of receipt thereof. Should it not be possible to address the query within the stated time frame, the owner shall be informed of such, stating the reasons for the delay and providing a new deadline for responding to the query in question, which in no event shall exceed five (5) business days following the expiry of the first deadline.

Should the owner consider that his or her information should be corrected, updated, or deleted, or whenever any breach is detected with Grupo SURA's duties, a complaint may be lodged providing a description of the facts giving rise to such, the address of the owner of the information, along with any supporting evidence in the form of attachments,. Should the complaint fail to include the required information, the owner shall be given five (5) business days following receipt of such to remedy the deficiencies found. Should the owner fail to provide the information required within a period of two (2) months from the date the complaint is filed, it shall be understood that the owner has desisted from such.

The maximum term for addressing the complaint made shall be fifteen (15) business days beginning on the business day following the date of its receipt. Should it not be possible to address the complaint within said period, the owner shall be informed of the reasons for the delay and the date on which his or her

complaint shall be dealt with, which under no circumstance shall exceed eight (8) business days following the expiry of the first deadline.

5. Collected and stored information belonging to shareholders, investors, suppliers, service providers, employees and any other private individual who comes into contact with Grupo SURA.

Depending on the relationship that the owner has with Grupo SURA, collected or stored information may include:

- General information such as name, date of birth, ID number and types of ID document, age, marital status, address, telephone and mobile phone numbers, email address, comments, workplace, position and level.
- Individual data based on the type of relationship held with Grupo SURA: resúmenes, job information, academic information, financial information, nationality, photographic records, and all other data relating to private individuals in their capacity as shareholders, investors, employees suppliers or service providers, as applicable.
- Sensitive data: biometric and photographic records.

6. Processing sensitive data

Grupo SURA shall not collect, process or store the sensitive data of private individuals, unless the owner has expressly consented to such.

This consent shall only be requested when necessary and to the extent of the relationship with the owner, providing applicable legislation requires or allows access to such sensitive information.

Consent for processing sensitive data shall be requested beforehand, and this request shall state the purpose of such. Furthermore, it shall state that the answers given to the questions formulated are optional, and shall list the other items as herein described for obtaining consent for the processing of personal information.

No sensitive data may be processed for purposes other than those authorized by the owner of such.

Any access to, movement with or processing of sensitive data shall be restricted and limited to that expressly authorized by the owner as well as that provided by law.

7. Purpose for which an individual's personal information is handled

Grupo SURA shall only collect the data that is absolutely necessary for the purposes for which it is authorized, as reported by the owner, as well as in accordance with other terms and conditions herein stipulated, providing such handling is done for a legitimate purpose and in keeping with the relationship Grupo SURA maintains with the owner.

- **Processing personal data belonging to shareholders and investors**

Personal data and information belonging to private individuals who are either shareholders or investors (including the holders or Grupo SURA's bonds or any other person who shall have acquired securities issued by Grupo SURA) shall be considered confidential information, since this is duly registered with applicable trade and commerce registers and is subject to special protection by law. However, this information shall be disclosed in all those circumstances stipulated by the rules and regulations governing the securities market for which the owner's consent shall have been obtained.

The purposes for which the personal data of shareholders or investors are to be used, shall include the following:

- To allow shareholders or investors to exercise their rights, enabling them also to exercise all those political and economic rights accorded in the Code of Commerce, Decree 2555 of 2010 and any other applicable rules and regulations;
- For Grupo SURA to send information, including invitations to events, quarterly newsletters (on its financial performance), annual reports, as well as communications relating to the activities being conducted by Grupo SURA;

iii. For issuing certificates evidencing the relationship between the owner of the personal information and Grupo SURA, such as certificates of income, equity interests, among others;

iv. For sharing personal information with subsidiaries or related companies belonging to Grupo SURA with the aim of offering products and services to the owner of such information. These companies are listed on Grupo SURA's Certificate of Good Standing and Legal Representation, which has been made publicly available;

v. For sharing information with suppliers with whom Grupo SURA carries out business activities in keeping with its corporate purpose, according to the constraints and regulations laid out by Grupo SURA.

- **Processing personal data belonging to employees**

The processing of personal data belonging to Grupo SURA's employees shall be subject to the provisions of this policy, and may only be used in compliance with existing labor legislation, or for faithfully complying with obligations incurred as part of employment contracts existing between the parties, when the owner's express consent has been obtained.

The purposes for which the personal data belonging to employees are to be used, shall include the following:

i. To allow employees to exercise their rights, as stipulated in the Labor Code and other applicable rules and regulations;

ii. For Grupo SURA to send information, including invitations to events, quarterly newsletters (on its financial performance), annual reports, as well as communications relating to the activities being conducted by Grupo SURA;

iii. For issuing certificates relating to the owners' status as employee of Grupo SURA, such as payment and deduction certificates, employment records, among others;

iv. For sharing personal information with subsidiaries or related companies belonging to Grupo SURA with the aim of offering products and services to the

owner of such. These companies are listed on Grupo SURA's Certificate of Good Standing and Legal Representation, which has been made publicly available;

v. For sharing information with suppliers with whom Grupo SURA carries out business activities in keeping with its corporate purpose, according to the constraints and regulations by Grupo SURA.

The information supplied by those interested in vacant positions offered by Grupo SURA and the personal information collected from the selection process is limited to the candidates' participation in such and therefore any other use made of such is strictly forbidden.

Personal data regarding former employees shall continue to be stored for authorized purposes and under the same conditions and security levels.

- **Processing personal data belonging to suppliers and service providers**

Personal data belonging to suppliers and service providers that are collected by Grupo SURA, shall be used to select, evaluate and execute the contractual relationship that may arise between the parties, with the aim of ensuring a greater knowledge of the supplier, a more enhanced handling of information for decision-making purposes, greater transparency in relationships, and more effective and efficient processes.

The purposes for which personal data belonging to suppliers and service providers are to be used, shall include the following:

- To ensure that contractual relationships are properly carried out and fulfilled;
- To send out invitations to participate in the hiring selection and monitor the pre-contractual, contractual and post-contractual stages;
- For analyzing and evaluating the adequacy and skills of the employees of the supplier or service provider in question, in the event that this is contractually required;

iv. For Grupo SURA to send information, including invitations to events, quarterly newsletters (on its financial performance), annual reports, as well as communications relating to the activities being conducted by Grupo SURA;

v. For issuing certificates relating to their status as suppliers or service providers of Grupo SURA, such as withholding tax certificates, letters of recommendation, among others;

vi. For sharing personal information with subsidiaries or related companies belonging to Grupo SURA with the aim of offering products and services to the owner of such. These companies are listed on Grupo SURA's Certificate of Good Standing and Legal Representation, which has been made publicly available;

vii. For sharing information with other suppliers with whom Grupo SURA carries out business activities in keeping with its corporate purpose, according to the constraints and regulations by Grupo SURA.

- **Processing personal data belonging to any private individual who comes into contact with Grupo SURA**

The information collected from private individuals who do not fall into any of the aforementioned categories, shall be protected in accordance with the provisions of this policy, and processed for the following purposes:

i. For Grupo SURA to send information, including invitations to events, quarterly newsletters (on its financial performance), annual reports, as well as communications relating to the activities being conducted by Grupo SURA;

ii. For issuing certificates evidencing the individual's relationship with Grupo SURA;

iii. For sharing personal information with subsidiaries or related companies belonging to Grupo SURA with the aim of offering products and services to the owner of such. These companies are listed on Grupo SURA's Certificate of Good Standing and Legal Representation, which has been made publicly available;

iv. For sharing information with other suppliers with whom Grupo SURA carries out business activities in keeping with its corporate purpose, according to the constraints and regulations by Grupo SURA.

8. International transfers of personal data

In order to provide a better service and to fulfill the purposes herein described, any personal data collected by Grupo SURA may be transmitted to servers hosted in foreign countries, under stringent security conditions thus ensuring compliance with that provided in Law 1581 of 2012 and Regulatory Decree 1377 of 2013.

9. Providing personal information to service providers

It may be possible that, by virtue of a relationship maintained with Grupo SURA, the owner should have to provide or share information with suppliers for the purposes expressly authorized by the owner or stipulated in the aforementioned legislation. Whenever information is shared with suppliers, Grupo SURA shall ensure that the supplier or service provider is bound to the same terms and conditions as herein stipulated, so that all personal information is duly protected, confidentiality agreements are entered into governing the information to be handled, and that obligations are established for the person responsible or hired to handle such information whenever warranted. For this purpose, Grupo SURA, in both its business and contractual relations where personal information is transmitted to a service provider, preventive audits are randomly performed in order to verify that the provisions of this policy have been adequately disseminated within these companies so that they may be applied to all areas and any contractors that may be hired for this purpose.

Whenever Grupo SURA is required to provide all or part of the databases for which it is responsible, a contract must be signed with the provider of the data processing services stipulating all those terms and conditions governing the delivery of such information and these must include the security levels required in order to maintain an adequate safekeeping of such data. Furthermore, the provider of these data processing services shall ensure the utmost confidentiality when handling personal information and shall be bound only to use such for the contractually-stipulated purposes. The providers of these services shall also fully understand their obligations in this regard as stipulated by law.

10. Preferences for sending information relating to Grupo SURA.

The owners of personal information may contact Grupo SURA using the means indicated for exercising their rights in order to state how they wish Grupo SURA to send them information regarding the different activities and projects being carried out. They may also request Grupo SURA not to send them information, without prejudice to Grupo SURA continuing to send information as required by the contractual relationship between the two parties, when applicable. Our purpose here is to comply with the cancellation request made by the owner of information within a reasonable time frame, however, if Grupo SURA has shared such personal information prior to receiving the cancellation request, in accordance with the authorization previously granted by the owner, we cannot guarantee that this information does not continue to be sent when this is stored on a data base for which Grupo SURA is not responsible.

11. Period of validity for processing data

The information provided by the owners, shall remain stored for the amount of time required for fulfilling the purposes for which it was acquired in the first place.

12. Amendments to this Personal Data Protection Policy

Grupo SURA shall reserve the right to amend this Personal Data Protection Policy so as to be able to adapt it to any new legal, technical or case law requirements and generally speaking, whenever such amendments are necessary in order to provide a better service.

The Corporate Planning Department is responsible for updating and disseminating this Personal Data Protection Policy. Any amendments made to this policy must be approved by the Legal Department.

On the other hand, each of Grupo SURA's Departments and Areas that are provided access to the personal data belonging to third parties must be fully cognizant of the contents of this policy and shall be responsible for ensuring that

the holders of all personal information handled are able to exercise their inherent rights.

The company responsible for processing the personal information, herein addressed, is Grupo de Inversiones Suramericana SA, a joint stock company, duly incorporated according to Colombian legislation, whose main registered place of business is Calle 49 No. 63 – 146, Piso 8, Medellin, Colombia. email: protecciondedatos@gruposura.com.co

Date of latest update: March 13, 2015

Attachment: Definitions

In accordance with the provisions of Law 1581 of 2012, for the purpose of establishing the policies, procedures, standards and other considerations regarding the processing of personal data, the following definitions shall apply:

- a) **Authorization:** the prior, express and informed consent granted by the owners of the personal data to be processed.
- b) **Database:** an organized set of personal data to be processed.
- c) **Personal Data:** any information that may relate or be linked to one or more specific or identifiable private individuals.

For the purposes set out in this policy, the classification of personal data as stipulated in Law 1581 of 2012, Regulatory Decree 1377 of 2013 and Ruling C-748 of 2011 must be borne in mind.

- Public information: That which is stipulated as such by law or the Colombian Constitution and all that which does not constitute private or semi-private data, in accordance with Law 1581 of 2012. Public information shall be considered as being the data contained in public documents, court rulings that have been duly executed and that are not subject to any confidentiality obligations as well as that relating to the marital status of private individuals, amongst other concepts.
 - Semi-private data: This shall be considered to have a private, confidential, non-public nature concerning the owner but which is of interest to a certain sector or a group of people or the public at large, this including financial and credit data concerning the business activities or services referred to under Heading IV of Law 1581 of 2012.
 - Private data: This is considered to be the private and confidential information applicable only to the owner of such.
 - Sensitive data: This is understood to be information that affects the privacy of the owner of such, which in the case of being misused, could lead to him or her being discriminated against, this including information revealing racial or ethnic origins, political orientations, religious or philosophical beliefs, trade unions, social or human rights organization, promoting the interests of any political party or ensuring the rights and guarantees of the opposition parties as well as data concerning the health and sexuality of the owner as well as his or her biometric data.
- d) Data Processing Agent: any private individual or legal entity, from the public or private sectors, which either independently or in association with others, processes personal data for the person responsible for such data processing.
- e) Person responsible for the data processing function: any private individual or legal entity, from the public or private sectors, which either independently

or in association with others, makes decisions concerning the data base and or the data processing function.

In order to carry out the processing of personal data, the person responsible should do all that required to ensure compliance with the following duties, in accordance with that stipulated in the Statutory Law for the Protection of Personal Data.

- f) Owner: any private individual whose personal data is processed.
- g) Data processing: any operation or set of operations performed on personal data, such as collecting, storing, using, circulating or deleting such.