



2021 PRIVACY REPORT

Grupo de Inversiones Suramericana S.A. (hereinafter, Grupo SURA), the parent company of Grupo Empresarial SURA, acknowledges the value of the information provided by its clients, shareholders, suppliers, and employees, who in turn have entrusted their data to the organization under the premise that it will be exclusively used for the ends previously authorized by them. In compliance with this mandate, the companies of Grupo Empresarial SURA have adopted high standards of confidentiality, protection measures, and mechanisms that seek to guarantee the rights of the owners of the information.

Bearing in mind the principle of transparency, Grupo SURA presents this report to brief on highlights and initiatives underway related to the privacy of its stakeholders; to inform the complaints received during 2020 and management thereof; to remind the rights of the owners of the information and the channels in which they can exercise said rights, among other aspects of general interest.

Highlights and Initiatives Underway:

- External Circular 027 of 2020, issued by the Financial Superintendence of Colombia, enabled entities within the same financial conglomerate to implement a mechanism for the transference of information of their clients. The purpose is to facilitate the processes of finding any risks of money laundering and terrorism financing, and management thereof.

Based on the foregoing, Grupo SURA and the companies of the financial conglomerate of SURA – Bancolombia are currently analyzing the possibility of implementing these mechanisms of

information transferring to gain efficiency in their risk of money laundering and terrorism financing prevention processes, guaranteeing the security and protection of the clients' information.

- In 2020, the Financial Regulation Unit (or URF) of Colombia issued a paper about open banking and portability. Said paper includes a roadmap to adopt these schemes within the operations and infrastructure of the Colombian financial system. It also provides a valuable description of international standards and proposes a voluntary adoption model in Colombia.

Per URF (2020), open banking is a practice in which banks or other types of financial entities open their systems to share consumer information with other financial entities or third parties, with the prior authorization of the client and to enable these entities to provide services to the consumers who provide their authorization.

For the companies of Grupo Empresarial SURA, progress made in terms of open banking represents an excellent opportunity to provide their clients a service that is increasingly novel, inclusive, and efficient. This has led to participation in different forums proposed by the Colombian regulator and to the development of several initiatives which give way to adopt these schemes early on.

- Suramericana S.A. and its affiliates in Latin America are moving towards implementing mechanisms that enable the transmission of mutual information. The target is to provide better services to clients despite their country of origin. Hand in hand with this objective, the companies developed a model to serve the insured parties while they move overseas, through coverages and services of healthcare, mobility, legal affairs, and minor expenses – without having to cover additional costs of premiums already caused.

The development of the foregoing assistance model involved entering an international data transmission agreement that sets forth clear obligations for those responsible and in charge of the information. Hence, data treatment is made under a stringent respect for the privacy policies and other applicable standards.

- Through an external and independent consultant, SURA Asset Management Uruguay conducted an audit of its information management system to verify its duly complying with the quality standards and other applicable norms on privacy.
- Training-wise, companies of Grupo Empresarial SURA hold ongoing educational activities for their employees and other stakeholders. The purpose is to provide duly training on managing the personal data of clients and hence, fully meet the privacy and data protection policies.

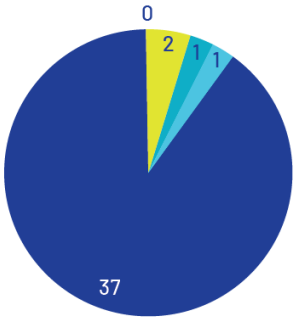
These training activities are held online, in groups, and using communication material that reminds the importance of guaranteeing privacy and the proper use of the information.

Complaints and Requirements on Privacy:

Grupo SURA

Grupo SURA did not receive any complaints in terms of privacy and data treatment in the year 2020. Nonetheless, the Company has a complaints management process in place that guarantees its stakeholders the possibility to exercise their rights over personal data.

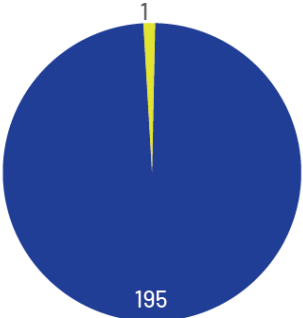
Suramericana and Affiliates



■ Chile ■ México ■ Perú ■ Colombia ■ Uruguay

To Suramericana S.A. and its affiliates, the complaints received in 2020 represent a very low number compared with the number of clients and employees held. Complaints were solely reported in Colombia and represented isolated events which led to identifying several operational failures; these were immediately corrected by the Company.

SURA Asset Management and Affiliates



■ Complaints ■ Requirements

On the other hand, SURA Asset Management and its affiliates¹ display numbers of complaints reported which are also quite low considering the number of clients held. Every case is studied and closely analyzed to implement the corrective actions needed. For instance, one of the complaints received in Mexico allowed the Company to reinforce the duties of confidentiality of their clients, even after their employment or commercial ties with the Company have ended.

¹ Figures from Protección S.A. are included as a strategic investment of Grupo SURA, but this firm is not subject to its control nor part of Grupo Empresarial SURA.

Serving Complaints and Requests – The Procedure

In terms of their privacy policies, every Company of Grupo Empresarial SURA has determined the procedure necessary to provide timely and effective solution to any complaints or requests presented by their clients, employees, suppliers, or anybody that has shared their data with the Group companies.

The foregoing procedures feature a verification stage used to identify the person that files the complaint or request. The contents of the petition are analyzed to settle it immediately or to re-direct it to the corresponding area. Then, a response is given to the party that made the request, either fulfilling the petition or giving the explanations necessary. Later on corrective measures are taken to guarantee full compliance with the Privacy and Data Treatment Policy, if necessary. Therefore, the system creates a virtuous circle for improving data protection and management permanently.

Specific terms have been set by the companies to serve these types of requests, with an average of 10 days, depending on the type of petition and the complexity thereof. Likewise, every Company has determined in their privacy policies the channels used for filing these requests, i.e. by phone, physical or online.

Rights of Information Owners

The privacy policies of every Company include the rights of the owners of the information. The following are examples of their rights:

- To update and rectify any correction needed in their personal data at any given time.
- To request proof of the authorization granted for the treatment, and to be informed about the use made of their data.
- To revoke the authorization and suppress the data when applicable while having access to them for free.
- Any treatment of personal data made by the companies requires the express, unequivocal, and informed previous consent of the information owners.

For more details about how your data is treated and the Privacy Policies of the companies of Grupo Empresarial SURA, please visit the website of each company:

Grupo SURA:

<https://www.gruposura.com/wp-content/uploads/2018/09/grupo-sura-politica-proteccion-datos-2018.pdf>

Suramericana:

<https://www.suraenlinea.com/politicas-privacidad>

Sura Asset Management:

<https://sura-am.com/sites/default/files/inline-files/Politica%20General%20de%20Datos%20Personales%20SURA%20AM.pdf>