



## **PERSONAL DATA PROCESSING, PRIVACY, AND PROTECTION POLICY PEI ASSET MANAGEMENT S.A.S.**

In compliance with Act 1581 of 2012 and Decree 1377 of 2013, this Personal Data Processing, Privacy, and Protection Policy applies to Estrategias Inmobiliarias Trust's clients, suppliers, employees, and investors or to those of any other investment vehicle managed by PEI Asset Management S.A.S. and the general public, Personal Data<sup>1</sup> Subjects<sup>2</sup> included in the databases of PEI Asset Management S.A.S., a company incorporated and existing under the laws of the Republic of Colombia, with TIN 900.472.480-1, domiciled in Bogota, D.C., and with its main offices at Calle 80 # 11-42, piso 10, telephone 7448999 ("PEI Asset Management"). Such Personal Data was collected in furtherance of PEI Asset Management S.A.S.'s corporate purpose, in connection with the purchase or sale of products and services, or marketing and recruitment activities carried out through electronic or physical media, or social networks. The Policy reads as follows:

### **1. PERSONAL DATA PROCESSING AND PERSONAL DATA PROCESSING PURPOSES**

#### **1.1 General Personal Data (suppliers, clients, investors, and employees.**

Personal data such as names and surnames, identification numbers, gender, date of birth, home address, telephone and cellphone numbers and emails of PEI Asset Management's employees and/or candidates in selection processes, clients and/or potential clients, suppliers and/or service suppliers, as well as those of any other investment vehicle managed by PEI Asset Management; those of PEI Asset Management's investors, potential investors, suppliers, and any other related individuals or entities used to fulfill PEI Asset Management's corporate purpose and specifically: (i) Comply with PEI Asset Management's labor obligations; (ii) Implement wellbeing activities and programs for PEI Asset Management's employees; (iii) Inform and issue corporate communications to PEI Asset Management's employees, suppliers, clients, and investors or those of other investment vehicles managed by PEI Asset Management; (iv) Implement marketing policies and activities relating to PEI Asset Management's assets and services; (v) Assess the service quality; (vi) Forward communications of interest to PEI Asset Management's employees, suppliers, clients, PEI's investors or those of other investment vehicles managed by PEI Asset Management; (vii) Procure the goods and services required by PEI Asset Management; (viii) Invite suppliers and contractors to selection processes for the procurement of the goods and services required

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<sup>1</sup> Personal Data Subject is an individual whose personal information is stored in PEI Asset Management's databases.

<sup>2</sup> Personal Data means any information related to or which may be associated with one or more determined or determinable individuals.

by PEI Asset Management; (ix) Conduct market prices researches in connection with the goods and services required by PEI Asset Management; (x) Provide information on the services offered by PEI Asset Management, organize commercial events or campaigns to promote, invite, directing, perform, inform and, in general, carry out commercial or advertisement-type campaigns, studies, promotions, or contests; (x) Enter into agreements with third parties; (xi) Issue purchase and/or services orders; (xii) conduct Consumer trend's researches; (xiii) Submit business and commercial and/or service offers; (xiv) Fulfill its duties as Real Estate Manager for PEI and any other investment vehicles; (xv) Any others derived from its corporate purpose.

## 1.2 Employees and Applicants Personal Data

Personal data of our employees, included in resumes submitted during the relevant selection process and in work contracts, is used to: verify and confirm their identity and manage and operate PEI Asset Management's human resources processes; to internally control the personal skills and knowledge, comply with obligations under the employment relationship with PEI Asset Management, integrate the employment records, payroll's payment and management, benefits, salaries and social security contributions, bonuses, reimbursements, pensions, and insurance payments; document and control the assignment of computer and communication assets; internal audits; create work email accounts; PEI Asset Management's contact directory; assign work tools, codes, and passwords; ensure compliance with confidentiality and other work obligations; verify personal and work references; contact family members, or dependents and/or beneficiaries in case of emergency.

On the other hand, the Personal Data of applicants in PEI Asset Management's employee selection processes, shall be used to verify and confirm their identity and to manage and operate its human resources-related processes; for internal control of the personnel's skills and knowledge; to verify personal and work references; and to contact and deliver information on the different stages of the selection process.

## **2. PERSONAL DATA SUBJECTS' RIGHTS**

All Personal Data Subjects whose information is stored in PEI Asset Management's databases, are informed about their rights concerning their personal data processing, which include: (i) Knowing, updating, and rectifying their Personal Data stored in PEI Asset Management's databases; (ii) Requesting, at any time, the rectification, modification, updating, or removal of their Personal Data; (iii) Requesting proof of the authorization provided for the storage of their Personal Data in PEI Asset Management's databases, except for article 10 of Act 1581 of 2012; (iv) Being informed, prior request, on the uses of their Personal Data; (v) Prior compliance with the legal requirements, file before the Superintendency of Industry and Commerce, complaints for any infringements, as provided for in Act 1581 of 2012 and any

other modifying, adding, or supplementing it; (vi) Revoking the authorization and/or requesting the removal and storage of their Personal Data from PEI Asset Management's databases, whenever their constitutional rights and guarantees are violated; (vii) Accessing their Personal Data, free of cost, as such data is stored in PEI Asset Management's databases; (viii) Demanding the confidentiality and reserve of the Personal Data provided, so that such data is only used for the purposes established hereunder; and (ix) Any other right granted under the of law or any Administrative Resolution issued by the Government or Congress in connection with Personal Data protection.

### **3. EXERCISE OF RIGHTS BY THE PERSONAL DATA SUBJECTS**

To exercise the rights established in paragraph (2) above, the Personal Data Subject may contact PEI Asset Management in its capacity as Data Controller of such information.

Below is the contact information of the person responsible for processing any queries or complaints of Data Subjects exercising their rights to access, update, rectify, remove data, or revoking their consent to process the personal data submitted:

Contact manager: Legal Manager  
Contact email: [abernal@pei.com.co](mailto:abernal@pei.com.co)  
Contact address: Calle 80 No. 11-42 Piso 10, Bogotá DC.  
Contact telephone: 7448999

### **4. PROCEDURE TO EXERCISE DATA SUBJECTS' RIGHTS**

In order to exercise their rights to know, update, rectify, and remove their Personal Data stored in PEI Asset Management's databases and revoke their authorization to use and store such information, the Data Subject must submit a request or complaint in writing, addressed to the managers in charge of privacy and data protection, depending on the nature of the relevant database.

The above request or complaint shall be answered in writing within the ten (10) business days following its effective notification to PEI Asset Management. The above term to provide the answer may be extended for an equal period, prior to the initial term's expiry.

If the request or complaint on the Personal Data's Processing, Privacy, and Protection refers to several databases, the Data Subject shall address the request or complaint to the managers in charge of each of the databases' Personal Data's privacy and protection.

**CONSULTS:** The Data Subject may consult his/her personal data, free of charge, at least once each calendar month. In order to know the personal Data Subject to PEI Asset Management's processing, the Data Subject may submit a request in writing to the abovementioned contact manager, indicating the information he/she wishes to access.

Such request shall be answered in writing, within a maximum term of ten (10) business days counted as of its receipt date. If the request cannot be solved within this term, this will be informed in writing to the petitioner, explaining the reasons for the delay and setting the date when the consult shall be answered, term that in no case shall exceed five (5) business days following the initial term expiration.

**COMPLAINTS:** Pursuant to article 14 of Act 1581 of 2012, whenever the Data Subject or his/her successors believe that the information contained in the database must be corrected, updated, removed, or revoked for an alleged violation of any of the duties provided for in Act 1581 of 2012, they may submit a complaint in writing to PEI Asset Management, which shall be processed according to the following rules:

The rectification, update, or removal rights, or revocation of the consent may only be exercised by:

- The Data Subject or his/her successors, prior proof of their identity
- The Data Subject's representative, prior proof the representation
- A third party authorized therefor by the Data Subject

Whenever the request is made by a person other than the Data Subject and the relevant representation is not evidenced, the request shall be deemed not submitted. A request for rectification, update, removal, or revocation shall be submitted in writing through the means established by PEI Asset Management and will include, at least, the following information:

1. Name and domicile of the Data Subject or any other means to receive an answer.
2. Documents proving the identity of the petitioner and, if applicable, that of his/her representative and the relevant authorization.
3. A clear and accurate description of the personal data with respect to which the Data Subject seeks to exercise any of his/her rights, and the relevant request.
4. If applicable, any other elements or documents to facilitate the personal data's location.

The maximum term to answer the complaint in writing shall be fifteen (15) business days counted as of the day following its receipt. Whenever the complaint cannot be solved within this term, the interested party shall be informed in writing, explaining the reasons for the delay and setting a date when the claim shall be answered, which in any case, shall not exceed eight (8) business days following the initial term's expiry.



The above request or complaint shall be answered within the ten (10) business days following the actual notice thereof. This term to provide an answer may be extended for an equal period, prior the initial term's expiry.

If the Personal Data Processing, Privacy, and Protection's request or complaint relates to several databases, the Data Subject shall address the request or complaint to the managers in charge of each of the databases' Personal Data's privacy and protection.

## **5. PUBLICATION AND MODIFICATION OF THE PERSONAL DATA'S PROCESSING, PRIVACY, AND PROTECTION POLICY**

The use and storage of the Personal Data in PEI Asset Management's databases shall follow PEI Asset Management's policy and procedures, which may consulted by the Data Subjects, at any time, at webpage [www.pei.com.co](http://www.pei.com.co).

Any modification to PEI Asset Management's Personal Data Processing, Privacy, and Protection Policy shall be published at webpage [www.pei.com.co](http://www.pei.com.co) and timely communicated to the Personal Data Subjects' email recorded in PEI Asset Management's databases.

## **6. COMPREHENSIVENESS**

This Personal Data Processing, Privacy, and Protection Policy is a part of the terms and conditions regulating the use of PEI Asset Management's webpage [www.pei.com.co](http://www.pei.com.co).

## **7. SECURITY MEASURES ADOPTED IN CONNECTION WITH THE PERSONAL DATA'S PROCESSING**

The Subject of the Personal Data stored in PEI Asset Management's databases is hereby informed that, any required technical, technological, and administrative measures have been adopted so as to ensure the Personal Data's security and prevent any alteration, loss, or unauthorized processing or use thereof.

## **8. VALIDITY OF THE PERSONAL DATA PROCESSING, PRIVACY, AND PROTECTION POLICY**

This Personal Data Processing, Privacy, and Protection Policy shall remain in force for as long as the purposes for which the information was collected remain.