

Personal Data Processing Policy

Date: January 2025

Version No. 2

In compliance with the provisions of the Habeas Data Regulations, **PEI ASSET MANAGEMENT SAS** . (hereinafter, “Pei AM” or the “Company”) through this Personal Data Processing Policy:

1. Establishes the purposes, measures and procedures of the Company's Databases;
2. It regulates the way in which the Processing of the information and Personal Data that the Holders provide or may provide in any way or that the Company collects and/or manages in any way and by any means is carried out; and
3. It establishes the mechanisms available to Data Subjects to know, update, rectify and delete the Personal Data provided or revoke the Authorization granted with the acceptance of this Processing Policy.

In accordance with the above, this Processing Policy is addressed to all Holders whose Personal Data are subject to Processing and/or are found in the Company's Databases. The Processing Policy shall be mandatory for all Company employees who, in the exercise of their duties and/or work activities, process Personal Data of the Owners.

By agreeing to provide Personal Data to Pei AM, the Data Subject voluntarily authorizes the Company to process such data under the terms of this Processing Policy.

1. DEFINITIONS

For the purposes of this Processing Policy, the capitalized terms used herein shall have the meaning assigned to them in **Annex 1** .

2. PERSONAL DATA COLLECTED.

The Personal Data that the Company may collect from the Holder, or that the Holder may provide to the Company, may include:

- Contact information (for example: your first and last name, email, phone number, home address, social media profile, etc.);
- Demographic information (for example: date of birth, age, gender, citizenship card, geographic location, nationality and place of residence);
- Information related to employment, disciplinary, judicial, police, criminal, tax and/or other background information; personal references or any other data required to carry out personnel selection processes or to contract goods or services;
- Financial and banking information and payment methods for the purposes of making payments or deposits and/or to comply with regulations associated with the prevention of ML/FT/FPADM;
- Information derived from the contractual, financial or commercial relationship with Pei AM and/or the Investment Vehicles.
- Information related to occupational health, social security, professional risks, among others.
- Likewise, if applicable due to the way in which the Personal Data is collected, Pei AM may collect information from the Holder such as their browser and operating system, Wi-Fi status, times and dates of access to Pei AM platforms or services.

3. METHODS OF COLLECTING PERSONAL DATA:

Pei AM may collect Personal Data from Holders, either directly or indirectly.

3.1. Direct:

- Electronic and online interaction, including communication channels used by Pei AM, such as email, telephone calls, social networks, website, supplier portal, electronic registration forms and other applications used for the operational management of the Company or the Investment Vehicles.
- In-person visits to the offices of Pei AM, to the assets owned by the Investment Vehicles or through records of entry to events, meetings, conferences, through attendance lists, closed surveillance circuits, meeting minutes and physical forms.
- Document management derived from the execution of contracts, agreements, satisfaction surveys, linking formats, generation of purchase orders, among others.

3.2. Indirect : Pei AM, in the exercise of its function as real estate manager or administrator, may collect Personal Data indirectly through the Investment Vehicles or the public or private entities that participate in the representation, administration, operation and/or marketing of the same, such as stockbrokers, trust companies, Securities Market Infrastructure Providers, real estate operators, investor representatives, among others.

These third parties in turn collect Personal Data through electronic and online interaction, telephone calls, web pages, electronic or physical registration forms and other applications used for the operational management of the Investment Vehicles or as part of the securities market infrastructure.

4. PURPOSES OF PROCESSING PERSONAL DATABASES AND INFORMATION.

Pei AM collects, compiles, stores and uses the Personal Data provided by the Holder, for some or all of the following purposes:

4.1. General Purposes :

- Comply with obligations related to the execution of the corporate purpose of Pei AM, compliance with the real estate management contract or the Database Manager, when Pei AM acts with respect to it as the Manager, within and outside the national territory;
- Contact the Holders to offer or provide goods or services from Pei AM and/or the Investment Vehicles, confirm appointments, request or send information and in general to establish communication between the Company or the Investment Vehicles and the Holders;
- Contact the Holders to conduct quality surveys, service levels, satisfaction, opinion, research, marketing, etc., whether regarding Pei AM or the Investment Vehicles;
- Contact the Holders to resolve requests, complaints and/or claims;
- Carry out due diligence processes of the Holders within the framework of the corresponding legal relationship, as well as for the processing of transactions and regulatory compliance under the latter;
- Set up a Database that may be subject to marketing, consultation, Transmission and/or Transfer of Personal Data;

- Transmit and/or Transfer the Database in whole or in part, free of charge or for a fee, to the different areas of Pei AM, to contractors, shareholders, allies, advisors, suppliers, authorities, subordinates and associates of Pei AM or to third parties related to the representation, administration and/or operation of the Investment Vehicles¹ when required for commercial, contractual, financial, administrative or operational purposes, including Sensitive Data. These third-party recipients of the Databases and Personal Data may provide you with Processing in Colombia or abroad;
- Comply with Colombian or foreign law, as well as with orders from judicial and administrative authorities;
- Send the Holder text messages, WhatsApp, email or any other digital or technological system, information of any nature about products and services, including commercial, of Pei AM, its Investment Vehicles under management and/or third parties with whom Pei AM or its Investment Vehicles have commercial, contractual or operational relationships;
- Use the Personal Data and other information that the Holder provides to the Company to be combined with other information of the Holder or third parties, obtained from technological platforms, sites or applications, in order to perform statistical analysis and metrics to understand how to improve the Holder's experience with Pei AM and/or its Investment Vehicles;
- Carry out all necessary steps to validate and update the information provided by the Holder;
- Control, maintain security, identify and provide access to the administrative offices of Pei AM and/or any of the real estate assets of the Investment Vehicles, including the use of this information when it constitutes evidence before a judicial or administrative authority.
- Carry out commercial events and/or promotions, in order to promote, invite, direct, execute, inform and, in general, carry out campaigns, studies, promotions or contests of a commercial or advertising nature;
- Conduct research regarding the market prices of goods and services required by Pei AM or by the Investment Vehicles;
- Comply with tax obligations, including sending information to tax authorities;
- Know financial and commercial behavior and compliance with legal obligations;
- Carry out all activities associated with the exercise of their functions as real estate manager or administrator of the Investment Vehicles managed by Pei AM.

4.2. Specific Purposes :

Pei AM, acting as Controller and/or Processor of Personal Data, for the proper development of its corporate purpose and the strengthening of its relations with third parties, collects, stores, uses, circulates and deletes Personal Data corresponding to natural persons with whom it has or has had a relationship, either directly or indirectly through the Investment Vehicles, the third parties that participate in their administration and operation or the Securities Market Infrastructure Providers.

By way of example and in addition to the general purposes mentioned above, Personal Data is

¹ In the case of the real estate investment vehicle Patrimonio Autónomo Estrategias Inmobiliarias – PEI, it includes the transfer of Personal Data to Fiduciaria Corficolombiana SA and Fiduciaria de Comercio Exterior SA - Fiducoldex

processed by Pei AM for all or some of the following purposes:

4.2.1. *Investors in the Investment Vehicles under the management of the Company :*

Pei AM collects Personal Data from investors or potential investors of the Investment Vehicles, as well as from contact persons of current, former and/or potential investors, both when acting as Controller or Processor of such data. The Processing of Personal Data of this interest group includes, but is not limited to, the following purposes:

- Issue summons and allow access to Investor General Assemblies of Investment Vehicles, whether ordinary or extraordinary, convene results conferences, *roadshows*, or commercial and informational events and, in general, any point of contact that is considered necessary for the correct administration and management of the investors.
- Provide information about the services or products offered by Pei AM or by the Investment Vehicles;
- Evaluate the quality of services provided by Pei AM or by the Investment Vehicles;
- Send communications of interest to investors in Investment Vehicles.

4.2.2. *Tenants, dealers and/or clients of the Investment Vehicles under management :*

Pei AM collects Personal Data from current, former and/or potential tenants and/or dealers of Investment Vehicles, as well as from some of the latter's contact persons, both when acting as Controller or as Processor of such data. The Processing of Personal Data of this interest group includes, but is not limited to, the following purposes:

- Prepare and/or manage the billing of Investment Vehicles;
- Invite to participate in client training and development programs;
- Preparation and/or execution of contracts, sending letters of intent or memoranda of understanding to establish contractual relationships;
- Evaluate customer satisfaction and the quality of services provided by Pei AM and/or the Investment Vehicles;
- Refer the Holders to suppliers of goods or services that the client requires, but that Pei AM does not offer;

4.2.3. **Vendors:**

Pei AM collects Personal Data from (i) vendors, (ii) potential vendors, and/or (iii) employees or contact persons of the latter. These data facilitate, among other things, the contracting processes, the execution and verification of compliance with the various contractual obligations. The Processing of Personal Data of this interest group includes, but is not limited to, the following purposes:

- Establish communication channels with the Holders of Personal Data, related to the activities established in this Processing Policy;
- Invite bids, enter into contracts, execute them, manage billing and payment for goods and/or services;

- Adopt control and security measures in the facilities under its purview;
- Analyse the risk assessment arising from current contractual relationships.

4.2.4. *Pei AM employees, candidates in selection processes and/or interns.*

Pei AM collects the Personal Data of employees, candidates in the selection processes carried out by the Company or interns who carry out their professional or technical practice at Pei AM, as well as some of the latter's contact persons in case of emergency. These data facilitate, among other things, the contracting processes, the execution and verification of compliance with the various labor obligations. The Processing of Personal Data of this interest group includes, but is not limited to, the following purposes:

- For the internal control of personal knowledge and skills of workers, candidates or interns;
- To comply with the obligations arising from the employment relationship that workers or interns maintain with Pei AM, which includes but is not limited to: (a) verify and confirm your identity; (b) manage and operate human resources processes; (c) carry out personal or professional knowledge and skills processes; (d) comply with the obligations arising from the employment relationship; (e) integrate employment files, payments and payroll administration, benefit payments, salaries and benefits, bonuses, reimbursements, pensions and insurance contracting; (f) document and control the allocation of computing and communications assets; (g) create work email accounts; (h) prepare the Pei AM directory; (h) assign work tools, keys and passwords; (i) ensure compliance with confidentiality obligations and other employment obligations; (j) verify personal and work references and (k) contact their relatives, financial dependents and/or beneficiaries in case of emergency, (l) conduct audits, supervisions, statistical processes or reviews by external advisors or lawyers, and (m) develop advertising and/or promotional activities, internal or external, of Pei AM and/or the Investment Vehicles;
- Verify personal and work references of workers, candidates or interns, contact their relatives, dependents and/or beneficiaries in case of emergency;
- The Personal Data of applicants who participate in employee selection processes, called by Pei AM, are used to verify and confirm their identity, as well as to manage and operate the human management processes within the Company, for the internal control of personal knowledge and skills, to verify personal and work references, to contact them and send them information regarding the different stages of the selection process.

Sole Paragraph: In accordance with the above, the Processing of your Personal Data is legitimized, among others, by: (i) the performance of a contract and/or business relationships, (ii) compliance with legal obligations; (iii) the interest in improving the services and products of the Company or the Investment Vehicles, and (iv) the management of requests, queries or possible claims that may arise.

5. **QUALITY OF CONTROLLER AND/OR DATA PROCESSOR.**

Depending on the way in which the Personal Data is obtained, Pei AM, in its capacity as real estate manager or administrator of the Investment Vehicles, may act either as Controller or as Data Processor of the Data Subjects. This includes the direct collection of Personal Data and the indirect collection through third parties who also process the Holder's Personal Data in the development of their legal and/or contractual functions.

6. **RIGHTS OF THE HOLDERS TO THEIR DATA PERSONAL.**

The Holder, as the owner of the Personal Data or as the subject to which such information refers, shall have the rights granted to them by the respective applicable laws. In Colombia, the Holders of Personal Data have their rights established by article 15 of the Political Constitution, Law 1581 of 2012, in Law 1266 of 2008, and in any other regulation that modifies, replaces or complements them, in particular, but not limited to Decree 1377 of 2013. These rights include, among others, the following:

- 6.1. Know, update, correct and rectify the Personal Data stored in Pei AM databases. For this purpose, it is necessary to previously establish the identification of the person to prevent unauthorized third parties from accessing the Holder's Personal Data;
- 6.2. Request, at any time, that your Personal Data be rectified, modified, updated or deleted. The deletion of information will not proceed when there is a legal or contractual obligation that imposes on the Company the obligation to maintain the information in the Company's Database or in the vehicles that the latter manages;
- 6.3. Request proof of the Authorization issued for the Processing of your Personal Data in the Pei AM databases, except as provided in Article 10 of Law 1581 of 2012²;
- 6.4. Oppose at any time to the processing of your Personal Data;
- 6.5. In compliance with the legal requirements, submit complaints to the Superintendency of Industry and Commerce for violations in accordance with the provisions of Law 1581 of 2012 and other regulations that modify, add to, complement or replace it;
- 6.6. Revoke the Authorization and/or request the deletion of your Personal Data and your storage in Pei AM databases, in case of violation of the rights and constitutional and legal guarantees. Said revocation will not proceed when there is a legal or contractual obligation that imposes the obligation to remain in the Database of the Company or of the vehicles that the latter manages;
- 6.7. Have free access to their Data Personal such as they are stored in Pei AM data bases;
- 6.8. Demand the confidentiality and reservation of the Personal Data provided, so that they are used only for the purposes established in this Processing Policy; and,
- 6.9. Any other right granted under the law or any administrative resolution issued by the Government or the Congress of the Republic of Colombia on the protection of Personal Data

The Holder may, at his/her discretion, decide whether or not to provide his/her Personal Data to Pei AM and what type of information to provide. Furthermore, the Holder shall be responsible for the veracity, authenticity and timeliness of the Personal Data provided.

7. PERSONAL DATA HOLDER'S RIGHT TO EXERCISE THEIR RIGHTS AND PROCESSING AREA .

7.1. Area responsible for exercising rights:

² Article 10. Cases in which authorization is not necessary. The Holder's authorization will not be necessary when it comes to:

- a) Information required by a public or administrative entity in the exercise of its legal functions or with a court order;
- b) Data of a public nature;
- c) Cases of medical or health emergencies;
- d) Processing of information authorized by law for historical, statistical or scientific purposes;
- e) Data related to the Civil Registry of Persons.

For the purposes of exercising the rights established in the previous section (to know, update, rectify, delete or revoke consent), the Holders may contact Pei AM through the following communication channels:

- Area of contact: Legal and Corporate Affairs Department.
- Contact Email: cbonilla@pei.com.co y/o legal@pei.com.co.
- Contact Address: Calle 28 No. 13ª-75, Piso 34º, Ed. Atrio Torre Norte, Bogotá D.C.
- Contact Phone : (601) 7448999

7.2. Legitimation for the Holder's exercise of his or her rights.

In accordance with the provisions of Article 20 of Decree 1377 of 2013, the rights of the Holders, as established in the Law, may be exercised by the following persons:

1. By the Holder, who must sufficiently prove his identity through the different means and/or channels made available to Pei AM and/or through the vehicles it manages.
2. By their successors, who must prove such status.
3. By the representative and/or agent of the Holder, upon prior representation certification or power of attorney.
4. By stipulation in favor of another or for another.
5. The rights of minors shall be exercised by persons who are authorized to exercise them.

If Pei AM's contact responsible for handling queries and claims does not resolve your concerns or does not address your complaint, you may contact the Superintendency of Industry and Commerce to present your concerns, complaints or claims.

8. PROCEDURE SO DATA PERSONAL HOLDERS CAN EXERCISE THEIR RIGHTS.

In accordance with Articles 14 and 15 of Law 1581 of 2012, to guarantee the right of the Holders to raise queries and/or complaints before Pei AM, the following procedure will be followed:

8.1. Queries:

The Holders may consult their Personal Data regarding as is stored in the databases of Pei AM, or which Pei AM processes. The query must be submitted in writing to the contact information provided in the previous section.

The query will be answered within a maximum period of ten (10) business days from the date of receipt. When it is not possible to respond to the query within this period, the interested party will be informed, stating the reasons for the delay and indicating the date on which the query will be responded to, which in no case may exceed five (5) business days following the expiration of the first period. In any case, the final response to the request will not take more than fifteen (15) business days from the date on which the initial request was received by the Company.

8.2. Claims:

Holders who consider that their Personal Data should be corrected, updated or deleted as a result of the alleged breach of any of the duties contained in the applicable laws by the Company, may file a claim, which will be processed under the rules indicated below. The same process may be followed in the event that they intend to revoke the Authorization granted.

The claim must be made by means of a written request addressed to the Company at any of the following email

addresses: cbonilla@pei.com.co and/or legal@pei.com.co , with the identification of the Holder, the description of the facts that give rise to the claim, the address, and accompanying the documents to assert. If the claim is incomplete, the interested party will be required within five (5) calendar days following receipt of the claim to correct the deficiencies. After two (2) months from the date of the request, if the applicant does not submit the required information, it will be understood that he has withdrawn the claim.

In the event that the person receiving the claim is not competent to resolve it, he/she will forward it to the appropriate party within a maximum period of two (2) business days and will inform the interested party of the situation.

- Once the complete claim has been received, a legend stating “claim in process” and the reason for this will be included on the site where the information is located and within a period of no more than two (2) business days. This text must be maintained until the claim is decided.
- The maximum term to address the claim will be fifteen (15) business days counted from the day following the date of receipt. When it is not possible to address the claim within said term, the interested party will be informed of the reasons for the delay and the date on which his claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.
- The Holder, his/her successors or representatives may only file a complaint with the Superintendence of Industry and Commerce once they have exhausted the consultation or claim process with the Data Controller or Data Processor.

9. SENSITIVE DATA:

The Holder is not be obliged to provide information relating to his/her Sensitive Data, as it is optional for the Data Subject to disclose this information.

10. PROCESSING OF PERSONAL DATA OF MINORS:

Personal Data pertaining minors has special protection and therefore its Processing is prohibited, except when it concerns data of a public nature, in accordance with the provisions of Article 7 of Law 1581 of 2012, or having the authorization of the minor's legal guardian.

11. INFORMATION MANAGEMENT AND PROCESSING:

Pei AM is not obliged to retain a copy, in any medium or format, of the personal information or Personal Data or any other type of information provided by the Holder, without the express, prior and informed Authorization that the Holder has given in regards to his/her knowledge and acceptance of this Processing Policy. The Holder is responsible for maintaining the original version of the personal information and other Personal Data provided. In turn, the Data Controller must retain proof of the Authorization granted by the Holder.

Pei AM and/or the Investment Vehicles may require goods and/or services from third parties, natural or legal, to develop their corporate purpose, for which reason they may provide or share with them the Holder's Personal Data. These persons will not be entitled to use the shared Personal Data beyond what is necessary and providing a comparable level of protection regarding their own personal information and Personal Data.

If Pei AM, its operations or assets were transferred or acquired by a third party, or in the hypothetical case that Pei AM terminates its activity, the Holder's Personal Data will be one of the assets that will be transferred to the third party acquired by it.

Personal Data will be disclosed when such disclosure is deemed necessary in good faith to comply with the law, including laws outside the country of residence of the Data Subject, enforcing the terms of use and other agreements, or to protect the rights of Pei AM, employees, users or others. This includes exchanging information

with other companies and organizations, including those outside the Holder's country of residence, for fraud protection and credit risk reduction.

12. TRANSFER AND/OR TRANSMISSION OF PERSONAL DATA:

The Holder expressly authorizes Pei AM to transfer and/or transmit personal information and any other type of Personal Data to third parties located within or outside the country, provided that, in accordance with article 26 of Law 1581 of 2012, said country complies with the appropriate levels and standards of data protection, which are duly established by the Superintendency of Industry and Commerce. The Transfer and/or Transmission, in any case, will be carried out solely for the purpose of fulfilling the objectives for which the Personal Data is collected and Processed.

13. RETENTION AND DELETION OF PERSONAL INFORMATION:

The holder is free to revoke, at any time, the Authorization expressly granted to Pei AM and third parties under the terms described in this Processing Policy. The Holder may revoke the Authorization through the procedure provided in section 8.2 above and may modify the personal information at any time.

Pei AM will also be free to delete, in whole or in part, the information and Personal Data it holds about the Holder, at any time without the need for express Authorization for this purpose. In any case, we retain and store Personal Data for as long as necessary to fulfill the purposes for which we collect it, unless otherwise provided by law.

14. ADVERTISING AND MODIFICATION OF THE TREATMENT POLICY.

Any modification to the Treatment Policy will be published in the page web www.peiam.com and will be communicated to the Personal Data Holders in a timely manner through the Company's various communication channels.

15. VALIDITY OF THE PRIVACY POLICY.

This Processing Policy will be in force from ___ of _____ of _____ and will be in force as long as the purposes for which the information of the Personal Data Holders has been collected continues. For its part, the Company's Databases, in which the data of the Holders will be stored, will be valid from the date of their creation until the moment in which they fulfill the purposes for which they were created.

Description	Version	Date dd-mm-year
Creation and approval of the document	1	[01-01-2019]
Updates	2	[01-01-2025]

ANNEX 1: **DEFINITIONS**

For the purposes of interpreting the Pei AM Processing Policy, the terms with initial capital letters used therein shall have the meaning assigned to them in this Annex 1. Technical or scientific words that are not expressly defined in this Annex 1 shall have the meanings that correspond to them according to the Habeas Data Rules, the respective technique or science, and the other words shall be understood in their natural and obvious sense, according to their general use.

Words of any gender will include the respective opposite gender. Terms denoting singular shall also include plural and vice versa, provided the context so requires.

- a) “ Authorization ”: Prior, express and informed consent of the Holder to Process Personal Data.
- b) “ Database ”: Organized set of Personal Data that is subject to Processing.
- c) “ Company ” or “ Pei AM ”: The Colombian company, whose corporate name is Pei Asset Management SAS, identified with Tax ID No. 900.018.481 - 3, domiciled at Calle 28 No. 13^a – 75 in the city of Bogotá DC;
- d) “ **Personal Data** ”: Any information linked to or that may be associated with one or several determined or determinable natural persons.
- e) “ **Sensitive data** ”: Those that affect the privacy of the Holder or whose improper use may lead to discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data relating to health, sexual life and biometric data.
- f) “ Data Processor ” or “ Processor ”: Natural or legal person, public or private, who by itself or in association with others, carries out the Processing of Personal Data on behalf of the Data Controller.
- g) “ Minor ”: Any natural person under 18 years of age.
- h) “ Habeas Data Regulations ”: The set of rules that establish and regulate the right to habeas data of natural persons in Colombia, which include, but are not limited to, Article 15 of the Political Constitution, Law 1581 of 2012, Decree 1377 of 2013 and other rules that modify, complement or replace them.
- i) “ Treatment Policy ”: This document is referred to as the Company's Personal Data Processing Policy as the Data Controller.
- j) “ Stock Market Infrastructure Vendors ”: Refers to the agents that facilitate the mechanisms and infrastructure to carry out the negotiation of securities, among which are, but not limited to, the Colombian Stock Exchange and/or centralized securities depositories.
- k) “ Data Controller ” or “ Controller ”: Natural or legal person, public or private, who by itself or in association with others, decides on the Database and/or the Processing of the data.
- l) “ **Holder** ”: Natural person whose personal data are subject to Processing. Holders include, but are not limited to, suppliers, employees, candidates for selection processes, students who are doing their internships at the Company, tenants, dealers, investors in Investment Vehicles, and in general, any third

party who, by reason of a commercial or legal relationship, provides Personal Data to the Company.

- m) "Transfer": The transfer of Personal Data takes place when the Data Controller and/or Data Processor, located in Colombia, sends the information or Personal Data to a recipient, who in turn is the Data Controller and is located within or outside the country.
- n) "Transmission ": The Processing of Personal Data that involves its communication within or outside the territory of the Republic of Colombia when its purpose is to by Processing by the Data Controller.
- o) "Data Processing " or "**Processing**": Any operation or set of operations with Personal Data, such as the collection, storage, use, circulation or suppression.
- p) "Investment Vehicles ": This corresponds to any of the investment vehicles that are under the administration or management of Pei AM, pursuant to a real estate administration or management contract. Among the investment vehicles managed by Pei AM is the Autonomous Assets Real Estate Strategies - PEI.