

## PRIVACY POLICY

GSMED undertakes to use the information you provide for the sole purpose of carrying out normal customer-supplier relationships and to facilitate business transactions between the parties. We do not share or sell the information in our databases and we protect your confidentiality to the extent permitted by law.

### 1. Use of cookies

Some pages of our website use cookies, small data files that are generated on the user's computer and that allow us to save the following information:

- Elements of personalization of the contents that the user chose on their first visit to our website.
- Elements involved in controlling access to restricted areas.

All our cookies store information in encrypted form and are automatically destroyed after a certain time and therefore do not constitute a threat to security or privacy.

### 2. Data protection

GSMED SAS is concerned with security and with guaranteeing the confidentiality of the data provided by our clients and users.

GSMED SAS ensures the confidentiality of the data provided by our users and guarantees that in no case will they be transferred to third parties. The logistics company that sends the order and the bank that carries out the economic transaction have access to this data solely and exclusively for the fulfillment of these purposes.

GSMED SAS DOES NOT store credit card number information when making payments in our store in any of our databases. The security and confidentiality of electronic transactions run under the banking entities and payment processors, which give greater confidence when making payments over the Internet.

## GENERAL PRIVACY POLICY

GSMED SAS, accepting and complying with the provisions of Law 1581 of 2012 and Regulatory Decree 1377 of 2013 and the provisions of Article 15 of our Political Constitution, adopts and applies this Policy for the processing of personal data. GSMED SAS, states that it guarantees privacy, privacy rights, and the good name of people, during the process of processing personal data, in all activities, which will have the principles of confidentiality, security, legality, access, freedom and transparency.

You agree not to reveal the information that is typed or transferred to our company, in accordance with the regulations of Law 527 that regulates Electronic Commerce in Colombia and Law 1581 of 2012 on the use of confidential data. With this Policy for the Treatment and Protection of Personal Data, it is supplemented by leaving agreements and policies issued previously without effect.

GSMED SAS, to comply with the data protection policies and the obligations of the Law 1581 of 2012, its Regulatory Decrees and other regulations that complement, add, enrich or modify it, take into account the following for the handling of information and personal data:

Personal information is one of the most important assets, therefore, the treatment of this information is carried out with great care and in accordance with what is established by law, guaranteeing people the full exercise and respect for their right of Habeas Data.

The information that is in the own Database has been obtained in the development of the activity of GSMED SAS, its compilation has been made and will always be done according to the legal criteria and regulations.

### SCOPE OF THE DATA PROTECTION POLICY:

The GSMED SAS Personal Data Protection Policy will be applied to all Databases and/or files that contain Personal Data, which for GSMED SAS is subject to Treatment as the person in charge and/or in charge of the processing of Personal Data.

The Processing of Personal Data must be done in the terms, conditions and scope of the authorization of the Holder and/or in application of the special rules when any legal exception to do so is appropriate. Any type of request, product of the exercise of the duties and rights enshrined in the policy, may be contacted by phone +57 310 296 6759 or email: [ventas@gsmmedimaging.com](mailto:ventas@gsmmedimaging.com). Personal data held by GSMED SAS. They will be treated according to the following general purposes:

For the fulfillment of the obligations and/or commitments derived from the relationships, contractual or not, existing with its stakeholders.

For compliance with legal obligations that involve personal data of its stakeholders.

For commercial management and relationship with its interest groups related to the products and services it offers to the market.

To communicate to your interest groups information about your products, services, publications, training events, commercial activities and advertising associated with your business activity, whether it is carried out directly or not.

To deploy corporate social responsibility activities towards its stakeholders.

To manage the security of people, goods and information assets held by the organization.

In each business process, and according to the personal data collected and treatment to be carried out, the respective privacy notice will inform the particular purposes in advance; name or company name and contact details of the person in charge or in charge of the treatment, and if the treatment is carried out by a person in charge, in which case said person in charge will be under the direction of GSMED SAS; the rights that assist the owner and the mechanisms provided by the company. to disclose the Privacy Policy.

Any person who is part of one of the interest groups, in their capacity as owner or legitimately authorized, in relation to the processing of their personal data has the right to:

Exercise your right of habeas data consisting of knowing, updating, rectifying, opposing and canceling the information collected from them, in those cases where appropriate.

Evidence the existence of the consent granted, unless there is legal authorization for the treatment.

## SPECIFIC PRIVACY POLICIES

I authorize my personal data to be incorporated into the GSMED SAS database and that I know the privacy policy defined by GSMED SAS that is explicit on the initial page of this web page. In the same way, I manifest, under the gravity of oath, that all the data registered here are true, complete, exact, real and verifiable.

I authorize GSMED SAS so that, through my email, text and/or voice messages, it can send me information related to promotions and any information of interest that improves the commercial relationship, since in the event that GSMED SAS accepts me as Through these means, the client informs me of my portfolio status and payment dates and notifies me of future credit information reports that are pending under the terms of Law 1266 of 2008.

### Cookies use policies

To better understand the needs of users and deliver a better service, this site uses anonymous identifiers ("cookies") to collect anonymous information on preferences and interests of its users. The information collected by this means is used to create anonymous profiles for any purpose, including, but not limited to, developing, manufacturing and marketing products. The information obtained by this means is never combined with personal data that allows the identification of a specific person (such as name, address or email address) or any information that may be considered sensitive or that may compromise the privacy of users.

## INTRODUCTION

Law 1581 of 2012 developed "the constitutional right that all people have to know, update and rectify the information that has been collected about them in databases or files, and the other rights, freedoms and constitutional guarantees referred to in Law 1581 of 2012. Article 15 of the Political Constitution; as well as the right to information enshrined in article 20 of the same". This constitutional right known as habeas data, gives citizens the ability to decide and control the information that others possess about them and, in this order of ideas, Law 1581 of 2012 enshrines mechanisms and guarantees that allow the full exercise of the aforementioned right. . In compliance with the provisions of Law 1581 of 2012, GSMED SAS, as the person responsible for the processing of personal data and sensitive personal data of interested parties, has adopted the following Information Treatment Policies, to guarantee that the treatment of personal data and sensitive personal data conforms to current legal provisions.

## COMPULSORY

These policies are mandatory and strict compliance by all GSMED SAS collaborators as well as by contractors and third parties related to the company.

All employees must know and comply with these policies in the performance of their duties, (In accordance with numeral 1 of article 58 of the Substantive Labor Code, it is a special obligation of the worker to "observe the precepts of the regulations and abide by and comply with the orders and instructions given in particular by the employer or his representatives").

In cases where there is no employment relationship, a contractual clause must be included in which the contractor undertakes to comply with these policies.

## DEFINITIONS

**Authorization:** Prior, express and informed consent of the Holder to carry out the Processing of personal data

**Authorized:** It is the Company and all the people under the responsibility of the Company that by virtue of the Authorization and this Policy, have the legitimacy to Process the Personal Data of the Holder. The Authorized includes the gender of the Authorized.

**Privacy Notice:** It is the verbal or written communication generated by the Responsible, addressed to the Owner for the Treatment of his Personal Data, by which he is informed about the existence of the information Treatment policies that will be applicable to him, the form to access them and the purposes of the Treatment that is intended to be given to Personal Data.

**Database:** Organized set of Personal Data that is subject to Treatment.

**Personal Data:** It is any information of any kind, linked or that can be associated with one or several determined or determinable natural or legal persons.

**Public data:** It is the data that is not semi-private, private or sensitive. Public data is considered, among others, the data related to the marital status of people, their profession or trade and their quality as merchant or public servant. Due to its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly executed court rulings that are not subject to confidentiality.

**Sensitive Data:** It is the Personal Data that affects the privacy of the Owner or whose improper use can generate discrimination, such as those that reveal union affiliations, racial or ethnic origin, political orientation, religious, moral or philosophical convictions, membership to unions, social organizations, human rights or that promote interests of any

political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.

**Manager:** It is the natural or legal person, public or private, that by itself or in association with others, performs the Processing of Personal Data on behalf of the Responsible.

**Authorization:** It is the legitimation that expressly and in writing through a contract or document that acts as its substitute, grants the Company to third parties, in compliance with the applicable Law, for the Processing of Personal Data, converting such third parties into Treatment Managers delivered or placed available.

**Query:** Request from the owner of the data or the persons authorized by it or by law to know the information that rests on it in databases or files.

**Manual:** It is the Internal Manual of Policies and Procedures for the Protection of Personal Data of the Company, in which the policies and procedures are consigned to guarantee adequate compliance with the Law.

**Responsible:** It is any person recipient of the Policy subject to compliance with this Policy for carrying out Personal Data Processing activities within, on behalf of, on behalf of or for the Company, including, but not limited to, anyone who is an employee, director, representative, contractor, agent, deputy, delegate, ambassador, shareholder, partner, external consultant, supplier and client of the company.

**Owner:** It is the natural or legal person to whom the information that rests in a Database refers and who is the subject of the right of habeas data, for being the owner of the corresponding Personal Data.

**Transfer:** It is the Treatment that implies the communication of Personal Data inside or outside the territory of the Republic of Colombia when its purpose is to carry out a Treatment by the Manager on behalf of the Responsible.

**Transmission:** It is the Treatment activity through which Personal Data is communicated, internally or with third parties, inside or outside the territory of the Republic of Colombia, when said communication is intended to carry out any Treatment activity by the recipient of the Data. Staff.

**Treatment:** It is any operation or set of operations, electronic or not, that allow the collection, conservation, ordering, storage, modification, relationship, use, circulation, evaluation, blocking, destruction and, in general, the processing of Personal Data, as well as its transfer to third parties through communications, consultations, interconnections, assignments, data messages.

## SENSITIVE DATA

GSMED SAS prohibits its collaborators, contractors and direct or indirect third parties from disclosing data considered sensitive in the constitution and the law, such as racial or ethnic origin, political preference, union affiliation, affiliation with governmental or non-governmental social organizations,

human rights organizations, religious convictions, sexual orientation, biometric or health data, etc., which are subject to reserve and confidentiality.

The processing of sensitive data is prohibited, with the exception of the cases explicitly indicated in article 6 of Law 1581 of 2012, that is, in cases in which:

The Holder has given his explicit authorization to said Treatment, except in cases where the granting of said authorization is not required by law

The Treatment is necessary to safeguard the vital interest of the Holder and he is physically or legally incapacitated. In these events, legal representatives must grant their authorization

The Treatment is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other non-profit organization, whose purpose is political, philosophical, religious or union, provided that they refer exclusively to its members or to people who maintain regular contact by reason of its purpose. In these events, the data may not be provided to third parties without the authorization of the Holder

The Treatment refers to data that is necessary for the recognition, exercise or defense of a right in a judicial process;

The Treatment has a historical, statistical or scientific purpose. In this event, the measures leading to the suppression of the identity of the Holders must be adopted.

In cases where the Processing of sensitive data is possible, the following obligations must be met:

Inform the owner that because it is sensitive data, he is not obliged to authorize its Treatment.

Inform the owner explicitly and in advance, in addition to the general authorization requirements for the collection of any type of personal data, which of the data that will be subject to Treatment are sensitive and the purpose of the Treatment, as well as obtain their express consent .

## RIGHTS OF DATA HOLDERS

The persons obliged to comply with these policies must respect and guarantee the following rights of the data subjects:

Know, update and rectify your personal data before the Treatment Managers or Treatment Managers. This right may be exercised, among others, against partial data,

inaccurate, incomplete, fractional, misleading, or those whose Treatment is expressly prohibited or has not been authorized.

Request proof of the authorization granted to the Treatment Manager except when expressly excepted as a requirement for Treatment, in accordance with the provisions of article 10 of Law 1581 of 2012.

Be informed by the Treatment Manager or the Treatment Manager, upon request, regarding the use that has been given to your personal data.

Submit complaints to the Superintendence of Industry and Commerce for violations of the provisions of this law and other regulations that modify, add or complement it.

Revoke the authorization and/or request the deletion of the data when the Treatment does not respect the constitutional and legal principles, rights and guarantees. The revocation and/or deletion will proceed when the Superintendency of Industry and Commerce has determined that in the Treatment the Responsible or Processor has incurred in conduct contrary to the Constitution and the law.

Free access to your personal data that have been processed.

#### PROCEDURE FOR THE EXERCISE OF RIGHTS BY HOLDERS

The Holders of personal data must file their queries, requests or claims at the Customer Service Office by contacting the email: [servicioalclienteonix1@gmail.com](mailto:servicioalclienteonix1@gmail.com)

Queries: GSMED SAS must respond to queries within a term of ten (10) business days from the date it was received. When it is not possible to comply with this time, the interested party must be informed, stating the reasons for the delay and the date on which the query will be addressed within a term of no more than five (5) days.

Claims: The Owner or successor in title who considers that the information contained in a database must be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the law or in this Policy, may present a claim to GSMED SAS which will be processed under the following rules:

The claim will be formulated by means of a request addressed to the Treatment Manager or the Treatment Manager, by email with the identification of the Owner, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert. If the claim is incomplete, GSMED SAS. will require the interested party within five (5) days of receipt thereof to correct the failures. After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.



Once the complete claim is received, a legend that says "claim in process" and the reason for it will be included in the database, within a term of no more than two (2) business days. Said legend must be maintained until the claim is decided.

iii. The maximum term to address the claim will be fifteen (15) business days 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 their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

The Owner or successor in title may file a complaint with the Superintendency of Industry and Commerce, once the consultation or claim procedure has been exhausted before the Treatment Manager or Treatment Manager.

Revocation of the authorization and/or deletion of the data: The Holders may at any time request GSMED SAS. the deletion of your personal data and/or revoke the authorization granted for the Treatment thereof, by filing a claim, in accordance with the provisions of article 15 of Law 1581 of 2012, decree 1377 of 2013 and the Procedure indicated in this Policy.

If the respective legal term GSMED SAS has expired. has not deleted the personal data, the Owner will have the right to request the Superintendence of Industry and Commerce to order the revocation of the authorization and/or the deletion of the personal data. Notwithstanding the foregoing, personal data must be kept when required to comply with a legal or contractual obligation.

## MODIFICATION

GSMED SAS, reserves the right to modify its personal data protection and treatment policy, when circumstances or the law advise or order it; case in which the modification will be made known through the means that the company considers suitable for the case.

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### 3.WORDPRESS

Our virtual store operates under WordPress, which is responsible for providing a platform for electronic commerce and selling our products and services to you.