<u>PERSONAL DATA PROTECTION POLICY:</u> this Policy has been made pursuant to the provisions of the Political Constitution of Colombia, Act 1581 of 2012, Regulatory Decree 1377 of 2013 and shall be applied by ALTERNATIVE TRAVEL CARTAGENA to the collection, storage, use, distribution, deletion and any other activity associated with the processing of personal data.

ALTERNATIVE TRAVEL CARTAGENA may use personal data to:

- a) Perform the contractual relationship between ALTERNATIVE TRAVEL CARTAGENA and its clients, suppliers and employees, including the payment of contractual obligations;
- b) Provide the services and/or the products required by its clients;
- c) Advise on new products or services and/or notify changes made to such products or services:
- d) Assess the quality of its service;
- e) Carry out internal research on consumption habits;
- f) Send communications containing commercial, advertising or promotional information on ALTERNATIVE TRAVEL CARTAGENA products and/or services, events and special offers in order to promote, invite, direct and, in general, inform about advertising campaigns, special offers or contests carried out by ALTERNATIVE TRAVEL CARTAGENA. ALTERNATIVE TRAVEL CARTAGENA has the obligation to ensure that your personal data is processed and protected in accordance with the provisions of the Data Protection Act and any other applicable legislation.
- g) Conduct surveys and/or opinion polls;
- h) Verify international sanctions, including, without limitation, those enforced by the OFAC (Office of Foreign Assets Control), the UN (United Nations), DFAT (Department of Foreign Affairs and Trade), INTERPOL, the UIAF (Spanish acronym for Financial Information and Analysis Unit), the DAS (Spanish acronym for Administrative Department of Security) or the Office of the Attorney General, as amended from time to time, or to access lists pursuing the same purpose.

In the event that sensitive personal data are collected, the Data Subject may refuse to authorize the Processing of personal data thereof.

Pursuant to the provisions of Article 8 of Act 1581 of 2002, by delivering your personal data to ALTERNATIVE TRAVEL CARTAGENA and acting as the Data Subject you are entitled to: request proof of the authorization granted to ALTERNATIVE TRAVEL CARTAGENA; revoke such authorization; be informed about the use of your personal data; and to know, update, rectify and access your personal data free of charge.

By delivering your personal data to ALTERNATIVE TRAVEL CARTAGENA you give your consent and agree to the terms and conditions of this Data Protection Policy.

In addition, this "Data Protection Policy" applies to any form of collection of personal data whether made in person, by telephone, electronically, verbally or in writing by ALTERNATIVE TRAVEL CARTAGENA, or its employees, officers, contractors or agents.

As a general rule, ALTERNATIVE TRAVEL CARTAGENA will not request sensitive data, meaning "those that affect the privacy of the subject or whose misuse may result in discrimination against the subject, such as those disclosing the race or ethnicity of the Data

Subject, his/her political affiliation or religious or philosophical beliefs, his/her membership to labor unions, social or human rights organizations or organizations that promote the interests of any political party or that ensure the rights and warranties of opposition political parties, as well as any data associated with the health, sex life and biometrical information of the Data Subject." (Article 5 of Act 1581/12).

Any collection of sensitive data carried out by ALTERNATIVE TRAVEL CARTAGENA at any time shall be made in compliance with the provisions of Article 6 of Act 1581, as amended by further regulations, and by requesting the prior express consent of the Data Subject.

The Data Subject is entitled to access his/her personal data and the details of the Processing of personal data thereof, as well as to have such data updated and rectified if they are inaccurate, to request deletion if the Data Subject considers that such data are redundant or unnecessary for the purposes that led to their collection or to refuse to have such personal data processed for any particular purpose. If the Data Subject wishes to implement any of the foregoing procedures, a request must be made at the Company's registered office or sent via e-mail to info@alternativetravelcartagena.com or contact us at this telephone number: +57 3203757261.

Claims made in respect of rectification, updating or deletion of personal data or resulting from an alleged breach to any of the obligations set forth in the applicable regulations must include the identification of the Data Subject, a description of the facts that led to the claim, his/her address, as well as any supporting document he/she wants to assert. If the claim is incomplete, the interested party will be required to provide the missing information within five (5) days of receipt of the claim. If after two (2) months from the date of the request, the interested party has not filed the required information, the claim will be deemed to be abandoned.

The maximum term to process the claim will be fifteen (15) working days from the day following the date of receipt thereof. If it is not possible to satisfy the claim within this term, the interested party will be notified of the reasons for the delay as well as of the date the claim will be processed, which in no case may exceed eight (8) working days following the expiry of the first term.

ALTERNATIVE TRAVEL CARTAGENA relies on internal information security procedures and protocols for accessing and managing databases in order to prevent the information provided by third parties from being misused. However, ALTERNATIVE TRAVEL CARTAGENA is not liable for any unlawful use by third parties, for technical or technological failures not controlled by ALTERNATIVE TRAVEL CARTAGENA, or for any situation attributable thereto.

ALTERNATIVE TRAVEL CARTAGENA reserves the right to make changes or updates to this Personal Data Protection Policy at any time in compliance with the applicable regulations as amended from time to time, internal policies or when deemed necessary by ALTERNATIVE TRAVEL CARTAGENA. Therefore, any change made to this Data Protection Policy shall be notified by means of the contact provided by the Data Subject or,

in the event that ALTERNATIVE TRAVEL CARTAGENA is not able to make this policy available to the Data Subject, it will be published on our website: www.alternativetravelcartagena.com. Changes made to this policy shall be published and will not come into effect until after their publication. Any changes made to this policy shall fully comply with the provisions of the applicable Colombian regulations.

The Data Subject agrees and acknowledges that the authorization for the use of his/her personal data shall be valid during the time in which ALTERNATIVE TRAVEL CARTAGENA carries out the activities set forth in its business purpose.