

1. INTRODUCTION

12 NIGHT GROUP SAS legally constituted company and identified with NIT **901.655.671-1**, with address at carrera 48 B No 10 Sur 153 Medellín Antioquia, with telephone number 604 3217771188 and email Servicioalcliente12nights@gmail.com based on the provisions of the Political Constitution of Colombia, Law 1581 of 2012 and other regulations that develop, complement, modify, replace or add, through the this document and in its capacity as person in charge of the information, gives know the Policy of Treatment and Protection of Personal Data of **12 NIGHTS GROUP SAS**

1. PURPOSE

The purpose of this document is to establish the principles, terms and conditions for the processing of personal data, an activity that includes the collection, storage, processing, updating, use, circulation, transfer and deletion of the information provided to **12 NIGHTS GROUP SAS** in the development of its corporate purpose. Additionally, the Policy of Treatment and Protection of Personal Data establishes the rights of the Owners of the Information, the procedures to make them effective and the internal procedures of the company to guarantee its obligation to protection of the personal data provided.

This way, **12 NIGHTS GROUP S.A.S** states that it guarantees the rights of privacy, intimacy, good name and autonomy, in the treatment of personal data, and consequently all their actions will be governed by the principles of legality, purpose, freedom, veracity or quality, transparency, access and restricted circulation, security and confidentiality.

All the people who, in the development of different contractual activities, commercial, labor, among others, whether permanent or occasional, will come to supply to **12 NIGHTS GROUP S.A.S** Any type of information **the date personal, you will be able to know it, update it and rectify it.**

III. LEGAL

15. Political Constitution, article 15.
16. Law 1266 of 2008.
17. Law 1581 of 2012.
18. Regulatory Decrees 1727 of 2009 and 2952 of 2010.
19. Partial Regulatory Decree 1377 of 2013.
20. Decree 886 of 2014.
21. Single Decree 1074 of 2015.
22. Sentences C 1011 of 2008, and C 748 of 2011, of the Constitutional Court.

It should be borne in mind that this policy will be governed by the entire current legal framework

and the other regulations that modify, add or complement it.

1. AREA OF APPLICATION

This policy will be applicable to the personal data registered in any database of **12 NIGHTS GROUP S.A.S** whose owner is a natural person.

1. DEFINITIONS

For the purposes of this policy and in accordance with the regulations in force regarding the protection of personal data, the following definitions:

1. **Authorization:** consent that, in a prior, express and informed manner The owner of some personal data issues for the company to carry out the processing of your personal data.

1. **Database:** organized set of personal data that is the object of Treatment, electronic or not, whatever the modality of its formation, storage, organization and access.

1. **assignee:** person who has succeeded another by reason of death of the latter (heir).

1. **Personal data:** any information linked or that can be associated to one or several determined or determinable natural persons.

1. **Public Data:** It is the personal data qualified as such according to the mandates

of the law or the Political Constitution and that which is not semi-private, private or sensitive Are public, among others, the data related to the state of persons, their profession or trade, their quality as a merchant or public servant and those that can be obtained without reservation. By its nature, public data may be contained, among others, in public records, public documents, gazettes and official bulletins, duly executed judicial sentences that are not subject to reservation.

1. **Semi-private data:** It is that information that is not of an intimate nature, reserved or public and whose knowledge or disclosure may be of interest not only to its owner but to a certain sector or group of people or to the society in general, as is the case of financial data, credit or activities commercial.

1. **Sensitive data:** is the Personal Data that affects the privacy of the Holder or whose improper use may generate discrimination, such as those revealing union affiliation, racial or ethnic origin, sexual orientation politics, religious, moral or philosophical convictions, membership in unions, social organizations, human rights or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as the data related to health, sexual life, and biometric data.

1. **digital information:** All information that is stored or transmitted by electronic and digital means such as email or other information systems.

1. **Processor:** natural or legal person, public or private, that by itself or in association with others, performs data processing personal on behalf of the data controller.

1. **Responsible for Treatment:** Natural or legal persona, public or private, by itself or in association with others, decides on the basis of data and/or data processing.

1. **Titular:** Natural person whose personal data is processed by **12 NIGHTS GROUP S.A.S** and who is subject to the right of you have data.

1. **Treatment:** Any operation or set of operations on data personal, such as the collection, storage, use, circulation or suppression.

1. **Notice of Privacy:** Verbal or written communication generated by the responsible and directed to the Owner for the processing of their data personal information, through which you are informed about the existence of the information processing policies that will be applicable to you, the form of access them and the purposes of the treatment that is intended to be given to personal data.

1. **Transfer:** Data transfer takes place when the responsible and/or in charge of the processing of personal data, located in Colombia, send the information or personal data to a recipient, which in turn is responsible for the treatment and is inside or outside from the country.

1. **Transmission:** Processing of personal data involving the communication of these inside or outside the territory of Colombia when has the purpose of carrying out a treatment by the person in charge of responsible account.

1. **Authorized:** Is **12 NIGHTS GROUP S.A.S** and all the people under the responsibility of the COMPANY, which by virtue of the Authorization and These Policies have legitimacy to Process the Personal Data of the Headline. The Authorized includes the gender of the Authorized.

1. **Qualification:** It is the legitimation that expressly and in writing through contract or document that takes its place, grants **12 NIGHTS GROUP S.A.S** to third parties, in compliance with the applicable Law, for the Treatment of Personal Data, converting such third parties into Managers of the Treatment of Personal Data delivered or made available.

1. BEGINNING

12 NIGHTS GROUP S.A.S, in the development of their commercial activities will collect, use, store, transmit and perform various operations on the personal data of the Owners. In all Data Processing Personnel carried out by the COMPANY, those responsible, Managers and/or third parties to whom Personal Data is transferred must comply with the principles and rules established in the Law and in this Policy, in order to guarantee the right to habeas data of the Holders and to comply with the obligations of Law of the Signature. These principles are:

1. **Prior authorization:**all processing of personal data will be carried out once the prior, express and informed Authorization of the Holder, unless the Law establishes an exception to this rule. In case of that the Personal Data have been obtained prior to the Law, The COMPANY will seek the ordinary and alternative means pertinent to summon the Holders and obtain their retroactive authorization, following the established by Decree 1377 and concordant norms.

1. **Freedom:**The processing of personal data is carried out prior express and informed authorization of the Owner by the owner or having into account the causes that relieve the consent of the owner and that are enshrined in the law.

1. **Legality regarding data processing: 12 NIGHTS GROUP S.A.S** will be subject to the provisions of the law and the provisions that the regular.

1. **Purpose:**All personal data processing activities must obey the purposes mentioned in this policy or in the authorization granted by the owner of the personal data, or in the specific documents where each type regulates the process of processing of personal data. the purpose of the particular treatment of a personal data must be informed to the owner of the personal data to the time to get your permission. personal data may not be

processed outside the purposes informed and consented to by the data holders.

1. **Veracity of the quality of the Data:**the personal data submitted to treatment must be truthful, complete, exact, up-to-date, verifiable and understandable
12 NIGHTS GROUP S.A.S does not process data personal information that is partially, divided and that its Treatment may lead to an error that may harm the owner of the data. treatment of information, when these cases arise,**12 NIGHTS GROUP S.A.S** will request the owner the necessary correction and update so that this situation does not continue to occur, in case of not being able to update the information will refrain from making a processing of these data.

1. **Transparency:**upon request of the owner, a solution must be given to the request that the owner raises about the information that rests in the database data. The response to this request will be carried out by the privacy directly. The unit in charge of treating the information will accompany the response process where necessary.

1. **Delivery of information to the Owner:**when the owner requests it, the COMPANY must provide you with information about the existence of data personal data concerning the applicant. This delivery of information will be carried out by the agency of the COMPANY in charge of the protection of personal data.

1. **restricted circulation:**personal data can only be processed by those COMPANY personnel who have authorization to do so, or those who, within their functions, are in charge of carrying out such activities. Personal data may not be delivered to those who do not have with authorization or have not been authorized by the COMPANY to carry out out the treatment.

1. **Restricted access:**except for the Data expressly authorized, the COMPANY may not make personal data available for access to

through the Internet or other means of mass communication, unless otherwise establish technical and security measures to control the access and restrict it to authorized persons only.

1. **Temporality:**As a general rule, the owner's information will not be used more beyond the reasonable period required by the purpose that was informed to the owner of personal data.

PARAGRAPH.In cases where there is special legislation on the subject, The information will be kept for the term indicated by the special law.

1. **Confidentiality: 12 NIGHTS GROUP S.A.S** should always do the Treatment providing technical, human and administrative measures that are necessary to maintain the confidentiality of the data and to prevent it from being adulterated, modified, consulted, used, accessed, deleted, or known by unauthorized persons or by persons Authorized and unauthorized fraudulently, or that the Data Staff miss. Any new project that involves the Treatment of Personal Data must be consulted this Treatment Policy to ensure compliance with this rule.

1. **Confidentiality and subsequent treatment:**all Personal Data that is not is public data must be treated by those responsible as confidential, even when the contractual relationship or the link between the owner of the data staff and signing is over. upon the termination of said link, such personal data must continue to be processed in accordance with this policy and with the law.

1. **Security:**the information subject to treatment by the person in charge of the treatment or person in charge of the treatment must be handled with the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, query, unauthorized or fraudulent use or access.

1. **Individualidad: 12 NIGHTS GROUP S.A.S** will keep way separately the databases in which it has the quality of manager or that

could become so, of the databases in which it acts as a responsible. **12 NIGHTS GROUP S.A.S** will give harmonic application, having taking into account the nature of the data and the above principles.

VII. RIGHTS OF HOLDERS

For all processes that involve the processing of personal data of customers, employees, suppliers, contractors, shareholders or third parties with whom

which is related to the development of the activities planned for the fulfillment of its corporate purpose, **12 NIGHTS GROUP S.A.S** should take into account and inform said persons expressly and in advance, for any means by which a record of their compliance, that in accordance with the law, the holders of personal data have the following rights:

1. Know, update and rectify your Personal Data against **12 NIGHTS GROUP S.A.S** or the Managers. This right may be exercised among others against partial, inaccurate, incomplete data, divided, that lead to error, or those whose Treatment is expressly prohibited or not authorized.
2. Request proof of authorization granted to **12 NIGHTS GROUP S.A.S**, except when expressly excepted as a requirement for the Treatment, in accordance with the provisions of the law.
3. submit applications **12 NIGHTS GROUP S.A.S** before or the person in charge of Treatment regarding the use that has been given to your Personal Data, and for them to deliver such information.
4. Be informed by the person responsible for the Treatment, upon request, regarding the use that has been given to your personal data.
5. Submit complaints to the Superintendence of Industry and Commerce for violations of the law.
6. be informed by **12 NIGHTS GROUP S.A.S** or the Manager, prior request, regarding the use that has been given to your personal data.

7. 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.

8. Revoke the authorization and/or request the deletion of your Data Personal databases of the COMPANY when the Superintendence of Industry and Commerce has determined through definitive administrative act that in the Treatment the Signature or the Person in charge of the Treatment has engaged in conduct contrary to the Law or when there is no legal or contractual obligation to maintain the Personal Data in the database of the person in charge.

9. Request access and free access to your Personal Data that have been subject to Treatment in accordance with article 21 of the Decree 1377 of 2013. The Holder of the Information may consult free of charge your personal data:

1. At least once every calendar month.

2. Whenever there are substantial changes to the Policies of Information Processing that motivate new consultations, being understood as substantial when the change refers to the purpose of the treatment.

10. Know the modifications to the terms of this Policy in a manner previous and efficient to the implementation of the new modifications or, failing that, of the new information treatment policy.

11. Have easy access to the text of this Policy and its modifications.

12. Access in an easy and simple way to the Personal Data that is are under the control of the Firm to effectively exercise the rights that the Law grants to the Holders.

13. Know the agency or person empowered by **12 NIGHTS GROUP S.A.S** to whom you can present complaints, queries, claims and any other request about your Personal Data.

14. The others provided for in Law 1581 of 2012 and the regulations that

modify, replace, develop and/or complement.

The Holders may exercise their legal rights and carry out the procedures established in this Policy, by presenting your identity card citizenship or original identification document. minors may exercise their rights personally, or through their parents or adults who hold parental authority, who must prove it through the relevant documentation. They may also exercise the rights of the Holder the successors in title that prove said quality, the representative and/or attorney of the holder with the corresponding accreditation and those who have made a stipulation in favor of another or for another.

VIII. DUTIES OF 12 NIGHTS GROUP S.A.S WITH THE HOLDERS OF DATA

Personal data belongs to its owners, who have the power to make decisions based on such data. Recognizing the above, **12 NIGHTS GROUP S.A.S** will use the personal data exclusively for the purposes permitted by current regulations and by this Policy, necessary for the compliance with the activities provided for in its corporate purpose. In consequence, **12 NIGHTS GROUP S.A.S** as data controller of the data informs the duties in charge:

1. Obtain the express authorization of the Data Owner, for any suitable medium.
2. Inform the Data Owner about their rights, when collecting the data, within the options allowed by current legal provisions.
3. Let the Data Holder know that it is his decision to respond and provide The required information.
4. Inform your suppliers, customers, contractors, employees, shareholders and any person from whom it receives personal data, the treatment that will be given to said data, as well as its purpose and update mechanisms; this will be reported by the media legally permitted, such as and not limited to the completion of

formats, sending text messages, access through social networks, access to the website of **12 NIGHTS GROUP S.A.S.**

5. Ensure that the Owner of the data is respected at all times the right to Habeas Data under the terms of the law and this Policy.

6. Preserve appropriately, securely the data records personal.

7. Report the identification data, physical or electronic address, telephone, of the official or area that will have the quality of responsible of the treatment, through any suitable means of dissemination.

1. CASES IN WHICH AUTHORIZATION IS NOT NECESSARY TO DATA PROCESSING

1. Information required by a public or administrative entity in exercise of their legal functions or by court order.

2. Data of a public nature.

3. Proven cases of medical or health urgency.

4. Treatment of information authorized by law for historical purposes, statisticians or scientists.

5. Data related to the Civil Registry of people.

6. PURPOSE OF THE PROCESSING OF PERSONAL DATA

The personal data of the holders of the information will be collected, stored, processed, used, circulated, transferred, transmitted, shared and/or deleted, in accordance with the contractual relationship established has established, in the following database and with the purpose indicated for she.

1. GENERAL PURPOSES OF THE DATABASE

The database stores all patient and customer information and within of which you can find information related to the name, mail email, among others.

This information is collected through physical, digital or virtual channels.

arranged by **12 NIGHTS GROUP S.A.S.** How can the delivery be at your headquarters?

physical, websites, social networks and virtual stores, and which is treated according to

with the following purposes:

1. Administrative, operational, industrial, commercial, social, promotional, informative, marketing, sales, for the improvement continuity and compliance in the development of its activities.
2. Exercise your right to sufficiently know the user with whom you aims to build relationships, deliver services, and assess risk present or future of the same relationships and services.
3. Offer jointly or separately with third parties or on behalf of third parties, financial, commercial and related services.
4. Carry out promotional campaigns, marketing, publicity, charity, social service or in conjunction with third parties.
5. Entry into contests or participation in surveys.
6. Event records.
7. Selection processes in the management of applicant information and direct and indirect employees.
8. Study and respond to requests for services from data owners in any time.
9. Manage all the information necessary for the fulfillment of the tax obligations and commercial, corporate and company accountants.
10. Comply with the internal processes of the company in terms of Vendor and contractor management.
11. Comply with the service contracts entered into with clients.
12. Other purposes determined by those responsible for processes of obtaining Personal Data for its Treatment and that are communicated to the Holders at the time of data collection personal.
13. The control and prevention of fraud and money laundering, including, but not limited to, the consultation in restrictive lists, and all the

necessary information required for the SARLAFT.

14. The process of archiving, updating systems, protection and custody of company information and databases.

15. Processes within the company, for development purposes or Operations and/or systems administration.

16. The transmission of data to third parties with whom the contracts for this purpose, for commercial, administrative, marketing and/or operations, including, but not limited to, the issuance of cards, personalized certificates and certifications to third parties, according to with current legal provisions.

17. Maintain and process by computer or other means, any type of information related to the client's business in order to provide relevant services and products.

18. Other purposes determined by those responsible for processes of obtaining Personal Data for Treatment, in order to give compliance with legal and regulatory obligations, as well as the policies of **12 NIGHTS GROUP S.A.S.**

Consequently, for the purposes described above, **12 NIGHTS GROUP S.A.S.**, you can, among other activities:

1. Know, store and process all the information provided by the holders of data in one or several databases, in the format that it deems more convenient.

2. Order, catalogue, classify, divide or separate the information provided by the data holders.

3. Verify, corroborate, check, validate, investigate or compare the information supplied by the data holders, with any information that is legitimately available to you, regarding any relationship that the owner of the data has with **12 NIGHTS GROUP S.A.S.**, where the data controller has prior authorization.

4. Access, consult, compare and evaluate all the information on the Holder is stored in the databases of any central

credit, financial, judicial or security background risk legitimately constituted, of a state or private nature, national or foreign, or any commercial or service database that allows establish comprehensively and historically complete the behavior that as a debtor, user, client, guarantor, endorser, affiliate, beneficiary, subscriber, contributor and/or as holder of services financial, commercial or of any other nature.

5. Analyze, process, evaluate, treat or compare the information provided by the Owner.

6. Study, analyze, personalize and use the information provided by the Holder for monitoring, development and/or improvement, both individual as a general, of conditions of service, administration, security or attention, as well as for the implementation of marketing plans, campaigns, special benefits and promotions.

7. Share with its shareholders and with allied, related, affiliated companies or with business allies that submit to the conditions of the present Policy.

8. Extend the information obtained in the legal terms, to the contracting companies for collection, storage and management of its databases, prior authorizations that it has for it.

XII. HOLDER AUTHORIZATION

To achieve the above purposes, **12 NIGHTS GROUP S.A.S** requires of the owners of the data their prior, free and duly authorization informed. This authorization from the Holder is a statement that informs you:

1. Who is responsible or in charge of collecting the information.
2. The data collected.
3. The rules to exercise the rights of access, deletion or data update.
4. The purposes of data processing.

5. Information on the collection of sensitive data.

6. The authorization may be recorded in any means permitted by the regulations in force, either physical or electronic, as long as it allows its consultation through organized systems.

To obtain the authorization of the Owner, **12 NIGHTS GROUP S.A.S** you can use, among others and without being limited to these means:

1. The different contracts entered into by **12 NIGHTS GROUP S.A.S**, provided that there is prior socialization of the Habeas Data Policy and in compliance with the legally established.

2. Registration form and registration / or update to the programs that you carry out

12 NIGHT GROUP S.A.S

3. Formats, letters, minutes and/or different authorization documents.

4. Activities through social networks, such as Facebook, YouTube, Google plus and Instagram.

5. The completion of established petition, complaint or claim forms by the company.

6. Through the means of communication established with the parties interested parties and through the means established by the company for the development of its activities and those stipulated for customer service at the National level.

7. To the data resulting from analysis, processing, evaluation, treatments and comparisons, the same will apply to them authorizations granted by the Holder.

8. In the events of personal data of minors and adolescents, **12 NIGHTS GROUP S.A.S** must have prior authorization express and informed of the father, mother or legal representative of the child or adolescent.

XIII. PROCEDURES FOR THE EXERCISE OF THE RIGHTS OF THE HOLDERS OF THE INFORMATION

The procedures and rules for the exercise of rights are described below.

rights in favor of the Holders of the Information. Channels and Schedules for the exercise of the rights to know, update, rectify and delete information, as well as to revoke the authorization, the Holders of the Information can make your requests via email

mccontabilidad@musicalcedar.com

Authorized Persons: the rights of the Holders of the Information may be exercised by the following people, accrediting the corresponding quality:

1. By the Holder, who must present the identity document.
2. By their successors in title, who must present the document of identity, civil registry of death of the Holder, document that accredits the capacity in which he acts and the identity document number of the Titular.
3. By the representative and/or attorney of the Holder, who must present valid identity document, document that accredits the quality in the that acts (power) and the number of the Holder's identity document.
4. Applicants must attach documents proving their condition to act against **12 NIGHTS GROUP S.A.S.**

Consultation procedure: queries will be answered within a term of ten (10) business days counted from the date of receipt of the respective request.

When it is not possible to attend to the query within said term, inform the interested party, stating the reasons for the delay and indicating the date on which your query will be addressed, which in no case may exceed the five (5) business days following the expiration of the first term.

Processing of requests or claims: the Holder or his assigns that consider that the information contained in the databases that it manages **12 NIGHTS GROUP S.A.S** must be subject to correction, update or deletion, or when they notice the alleged breach of any of the duties contained in the applicable law, may file a petition or claim before the person responsible for the treatment which will be processed under the following

rules:

1. The claim will be formulated by means of a request addressed to **12 NIGHTS GROUP**

S.A.S physically to the address carrera 48 B 10 SUR 153 de

Medellín or electronically to servicioalcliente12nights@gmail.com

1. The request must contain:
 2. Name and identification document of the Holder.
 3. Description of the facts that give rise to the claim and the objective pursued (update, correction or deletion, or compliance homework).
 3. Address and contact details and identification of the claimant.
 4. All the documentation that the claimant wants to assert.
 5. The COMPANY, before addressing the claim, will verify the identity of the Holder

of the Personal Data, its representative and/or proxy, or the accreditation of that there was a stipulation by another or for another. For this you can require the citizenship card or original identification document of the Holder, and the special, general powers or documents that are required as appropriate the case.

1. If the claim or additional documentation is incomplete, the COMPANY will require the claimant once within five (5) days following receipt of the claim to correct the failures. If he claimant does not present the documentation and information required within of the two (2) months following the date of the initial claim, it will be understood that the claim has been withdrawn.

1. If for any reason the person who receives the claim within the COMPANY is not competent to resolve it, it will transfer the claim to the as soon as possible to Management, and will report said remission to the claimant.

1. Upon receipt of the claim with complete documentation, it will be included in the COMPANY Database where the Owner's Data resides subject to claim a legend that says "claim in process" and the reason

of this, in a term not exceeding two (2) business days. This legend should remain until the claim is decided.

1. The maximum term to address the claim will be fifteen (15) business days counted from the day following the date of receipt. When it was not possible to address the claim within said term, the concerned, the reasons for the delay and the date on which your request will be processed.

claim, which in no case may exceed eight (8) business days following the expiration of the first term.

1. Once the complete claim is received, a legend that says "claim in process" and the reason for this, in a term no more than two (2) business days. Said legend shall be maintained until for the claim to be decided.

Complaints before the Superintendence of Industry and Commerce: the owner, assignee or proxy must first exhaust the consultation process or claim, before addressing the Superintendency of Industry and Commerce.

XIV. SECURITY MEASURES

The company is committed to the security of the information of which may be responsible or in charge, which is why to comply with and guarantee their security duty enshrined in Law 1581 of 2012.

For this reason, the company has implemented the following security measures: security for the different types of data it handles.

1. **GENERAL MEASURES FOR ALL TYPES OF DATA.**

2. Measures that prevent improper access or recovery of data that have been discarded, deleted or destroyed.

1. Restricted access to the place where the data is stored.

2. Authorization of the person in charge of managing the databases for the output of documents or supports by physical or electronic means.

1. Labeling system or identification of the type of information.

2. Inventory of supports.

3. Limited user access to the data necessary for the development of

its functions.

1. Updated list of authorized users and accesses.

2. Mechanisms to prevent access to data with rights other than those authorized.

1. Granting, alteration or cancellation of permits by staff authorized.

1. Record of incidents where the type of incident is indicated, time at which it occurred, sender of the notification, receiver notification, effects and corrective measures.

1. Incident notification and management procedure.

2. Definition of the functions and obligations of users with access to the data.

1. Definition of the control functions and authorizations delegated by the data controller.

1. Disclosure among staff of the rules and consequences of breach of these.

1. Preparation and implementation of the mandatory compliance manual for personnel where the scope of work is minimally consecrated application, security measures and procedures, functions and obligations of the personnel, description of the databases, incident procedure, identification of those in charge of treatment.

1. Documentation filing following procedures that guarantee a correct conservation, location and consultation, that allow the exercise of the rights of the owners.

1. Storage devices with mechanisms that prevent the access to unauthorized persons.

1. Duty of care and custody of the person in charge of documents during the review or processing of these.

1. Personalized identification of users to access the systems of

information and verification of your authorization.

1. Identification and authentication mechanisms such as passwords that require minimal parameters for their assignment and that have a periodic expiration that requires their change.

1. Access to data through secure networks.

2. Ordinary audit, which can be internal or external periodically against compliance with data protection obligations personal.

1. Extraordinary audit for substantial modifications in the systems of information.

1. Deficiency detection report and correction proposal.

2. Analysis and conclusions of the security manager and the manager of the treatment.

1. Appointment of one or several database administrators.

2. Appointment of one or more persons in charge of control and coordination of the measures of the personal data processing policy.

1. Prohibition of delegation of the responsibility of the person in charge of the treatment of the database administrators.

1. Regular compliance checks.

2. Access only by authorized personnel.

3. Access identification mechanism.

4. Log of unauthorized user access.

5. Destruction that prevents access or recovery of data.

6. Filing cabinets, cabinets or others located in access areas protected with keys or other measures.

1. Measures that prevent access or manipulation of documents physically stored.

1. Confidential labeling system.

2. Data encryption mechanisms for transmission and storage.

1. Record of accesses where the time was indicated, database to which accessed, what type of access was presented and what information was accessed.

1. Control of the access log by the security manager.

2. Access and transmission of data through secure electronic networks.

3. Transmission of data over encrypted networks, where data can be use systems

1. USO DE COOKIES O WEB BUGS

The cookies or web bugs used by the company through its website have no as the purpose of collecting personal data of the user, they are used for the purpose limited to provide the user with access to the website. The company also

You can use cookies for the session start, which will not be memorized permanently and will disappear once the user proceeds to close the

browser, these will be limited to collecting technical information for the purpose identification of the session and allow safe and efficient access to the web page, all this to provide the best service to the user.

If you do not allow the use of cookies, they can be rejected or in

If you have already existing cookies, delete them, this with the configuration of the browser from which access to the website is being made.

It is necessary to take into account that in case of blocking cookies or deleting them, this may affect the correct use of the website.

The cookies used by the company may be their own or from a third party, but the

The user will always have the option to decide on the use of cookies, taking

Take into account what has been indicated above about the effects of blocking or eliminating them.

XVI. NOTIFICATION, MANAGEMENT AND RESPONSE PROCEDURE BEFORE INCIDENTS.

The company has an established procedure for the notification, management and incident response seeking to ensure confidentiality, availability and integrity of the information contained in the databases under our responsibility.

The steps to be followed by the company are the following:

1. The incident is known, which may consist of: loss, theft and/or unauthorized access, which affect or may affect the confidentiality, availability and integrity of protected information of the company or one of its managers. It must be communicated immediately, to the area in charge of personal data protection. The type of incident must be described in detail. produced, indicating the persons who may have been related to the incident, the date and time it occurred, the person notifying the incident, the person to whom it is communicated and the effects it has produced.

1. Once the incident is reported, the area in charge of protection of personal data that issues the receipt stating that the incident was reported with all the requirements indicated above.

1. The area in charge will create a record of incidents that will contain the type of incidence, date and time of this, person who notifies it, person who communicates, effects generated by the incident and corrective measures that should be applied on a case-by-case basis.

1. Where permitted, the procedure for the data recovery, stating and leaving reflected, who executes the process, the data that will be restored and depending on the case, the data that had to be recorded manually during the recovery process.

1. Under the obligation stipulated in Law 1581 of 2012, the company will proceed inform the Superintendence of Industry and Commerce within 15 business days following the detection of the incident, this process is will be carried out through the National Database Registry and following the guidelines established by the SIC in its guides.

1. The company will notify the holders of the information that may have been affected by the incident, so that they can take the respective protection measures.

1. After the respective study of the incidence, the company will implement the corrections according to the incidence presented.

XVII. VIDEO SURVEILLANCE SYSTEMS

12 NIGHTS GROUP S.A.S, reports on the existence of mechanisms of security adopted by displaying video ads on visible sites surveillance. In accordance with the above, the company has a system of surveillance installed inside and outside the production plant and offices.

XVIII. IMAGE PROCESSING

The processing of personal data has been defined as "any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion" in the case of images of specific or determinable persons operations such as recruitment, recording, transmission, storage, preservation, or reproduction in real time or later, among others, are considered as data processing personal and consequently, are subject to the General regime of Data Protection.

1. **AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA:**with understands that the owner of the information has given his authorization when whether in writing, orally or through unequivocal conduct, that is, those that do not admit doubt or mistake and that allow to conclude in a reasonable person who gave the authorization.

The holders of personal data will be informed that they are in a video surveillance area through signs or notices implemented that will comply with the following content:

1. Include information about who is responsible for the treatment and your contact details.
 1. Indicate the treatment that will be given to the data and the purpose of this.
 2. Include the rights of the owners of the information.
 3. Indicate the place where the information treatment policy is published information

2. **DISCLOSURE OF INFORMATION:** access and disclosure of images will be restricted and their treatment will only be by people authorized by the Holder and/or by requests of an authority in exercise of their functions. Consequently, this information that is collected by means of surveillance system will be controlled and consistent with the purpose established by the data controller.

XIX. INFORMATIC SECURITY

12 NIGHTS GROUP S.A.S has implemented a security policy

Strictly compliant IT for all employees, focused on

prevent the use and access does not authorize personal data.

The company makes security and privacy statement in order to demonstrate and communicate your commitment to a highly ethical business practice and equipped with appropriate internal controls. Furthermore, he makes this statement to guarantee the commitment to the protection of the personal data of the internal and external users of the company.

1. RESPONSIBLE DATA PROTECTION OFFICER

Any request, query, complaint or claim related to the handling of data personal, in application of the provisions of Law 1581 of 2012 and Decree 1377 of 2013, should be sent to:

Entity: **12 NIGHTS GROUP S.A.S**

Dependency: Administration

Physical address: Carrera 48 B 10 SUR 153 of Medellín or electronically to

Email: servicioalcliente12nights@gmail.com

Phone: 57 6043217771188/3137575120

Some of the particular functions of this area in relation to Data personal are:

1. Receive requests from Personal Data Holders, process and answer those that are based on the Law or these Policies, such as, for example: requests to update Personal Data; requests to know Personal Data; requests for deletion of

Personal Data when the Holder presents a copy of the decision of the Superintendency of Industry and Commerce in accordance with the provisions in the Law, requests for information on the use given to your Data Personal, requests to update Personal Data, requests for proof of the Authorization granted, when it has proceeded according to the Law.

1. Respond to the Holders of Personal Data on those requests that do not proceed in accordance with the Law.

XXI. VALIDITY AND MODIFICATIONS.

This version of the Personal Data Processing Policy will be published on the website of **12 NIGHTS GROUP S.A.S.**, the information will also be disseminated among officials, collaborators, suppliers and other people who have any responsibility in the processing of personal data. The company will reserves the right to modify this Personal Data Treatment Policy at any time, any changes will be informed and published opportunely.

Finally, **12 NIGHT GROUP S.A.S** is committed to the realization of diffusion and training campaigns for the proper understanding and application of this Personal Data Processing Policy. This is the first version which becomes effective as of January 1, 2023.