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Personal Data Protection Policy

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Celsia S.A. E.S.P. (from now on, "Celsia", or the "Company"), in compliance with Law 1581 of 2012, and Regulations Decree 1377 of 2013, that regulate the collection and processing of personal information, emits the following document that develops the personal information processing policies of the Company, considering the following:

CONSIDERANDOS

1. That article 15 of the Political Constitution of Colombia determines that "(...) All persons have the right to personal and family privacy and to their good name, and the State must respect and enforce these rights. Moreover, they have the right to learn, update, and correct information collected about them in data banks and in the archives of public and private entities (...)". This constitutional precept enshrines three fundamental, autonomous rights; namely privacy, a good name, and Habeas Data. The constitutional precept developed in this document is that of Habeas Data, which is the right that guarantees and protects everything related to learning, updating, and correcting Personal Information contained in databases and archives, developed and protected by Law 1581 of 2012 and Regulatory Decree 1377 of 2013. These norms are the basis on which this manual is developed. It can be adjusted when the legislating body, the National Government, or Celsia incorporate changes that affect it.
2. The right of Habeas Data must therefore be understood as a fundamental autonomous right made up by computing self-determination and freedom.
3. Observance of, respect of, and compliance with orders and instructions specifically imparted by the Organization with respect to Personal Information corresponds to both Celsia management, as well as its employees and third-party contractors. Dissemination or undue use may generate damages to the Owners of said personal information, in compliance with the rights contained in Article 15 of the Political Constitution of Colombia, Law 1581 of 2012, and Regulatory Decree 1377 of 2013.
4. That the legal norms related to Personal Information establish economic and commercial sanctions, as well as jail time. The cooperation of CELSIA and the recipients of these policies is therefore fundamental so as to guarantee the compliance of the rights to intimacy, the habeas data, and the protection of Personal Information, thus avoiding possible damages to the parties involved and/or third parties.
5. That the regulation of the Information Security Policies, especially regarding work relationships and service providing, must include the protection of personal information related to the human resource, respecting the minimum rights and guarantees of the employees and service providers, under threat that the stipulations do not produce effect.
6. That in accordance to the current labor legislation, the duty of the employer to protect its employees is evident, and for the employees the duty to obey and observe loyalty with CELSIA is evident, thus contributing to the secure management of the personal information.
7. That these policies. Supplement and do not contravene the obligations of employees and CELSIA contained in the current labor legislation.

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8. That is the duty of employees to provide all of their collaboration to Celsia in case of accident or imminent risk that affects or threatens the information assets, especially those related to personal information kept in custody by Celsia, so that all help needed by the Company to investigate, analyze, and capture evidence regarding security incidents that compromise this information, be they legally admissible or not, complying in this manner with the instructions contained in the custody chain protocol of Celsia.

Based on the above considerations that lay the foundations for the protection of Personal Information at CELSIA, the following provisions were devised for its Processing. All recipients of this handbook must comply with its contents.

I. DEFINITIONS.

For purposes of this document, unless otherwise stipulated, terms in capital letters used herein will have the meanings given to them in Law 1581 of 2012, and in Decree 1377 of 2013:

Database. Is all organized set of personal information that is the object of Processing.

Database Custodian. Is the physical person that has the custody of the Personal Information database within Celsia.

Personal Information. Any information associated to, or that can be associated to, one or many determined or undetermined natural persons.

Public information. Information that is not semi-private, private, or sensitive. Personal Information is considered to be, among others, information related to the marital status of the persons, their profession or trade, and their status as merchant or public servant. Due to its nature, personal information can be contained, among others, in public records, public documents, magazines, official bulletins, and judicial sentences that have been duly executed and that are not subject to privacy.

Sensitive Information. Sensitive Information is understood to be information that affects the intimacy of the Owner, or the undue use of which could result in discrimination, such as information that reveals ethnic or racial origin, political orientation, religious or philosophical beliefs, membership in unions, social or human rights organizations, or those that promote the interests of any political party, or that guarantees the rights and guarantees of political parties of the opposition, as well as information regarding health, sex life, and biometric data.

Processor. Natural or legal person, public or private, that by him/herself, or associated with others, Processes personal information on behalf of the Processor.

Habeas Data. The fundamental right of all persons to learn, update, correct, and/or cancel Personal Information and data that has been collected and/or processed in public or private Databases, in accordance with legal provisions and other applicable rules and regulations.

Principles of Information Processing. The fundamental legal and/or jurisprudential rules that inspire and guide the Processing of Personal Information, on the basis of which actions and criteria are determined to resolve possible conflicts between the right to information and the right to privacy, Habeas Data, and Personal Information protection.

Processor. Natural or legal person, public or private, that by him/herself, or associated with others, makes decisions based on the Databases and/or the Processing of information.

Owner. The physical person whose data is the subject of Processing.

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Processing. Any operation, or set of operations, related to personal information, such as collection, storage, use, circulation, or suppression.

Transference. Transference of data takes place when the Party Responsible and/or Processor of the Personal Information, located in Colombia, sends the data or the personal information to a receptor, who is also a Processor, that is in the country or abroad.

Jl. PURPOSE.

(i) Adopt and establish the rules applicable to the Processing of Personal Information collected, processed and/or stored by Celsia while engaged in its business purposes, whether as the Responsible Party and/or Processor.

The rules contained in these policies comply with the provisions of Law 1581 of 2012 and Decree 1377 of 2013, Article 15 of the Political Constitution of Colombia, with regards to the guarantee of personal privacy, Habeas Data, and the protection of Personal Information, and in accordance with the right to information, so that these rights are proportionally regulated at Celsia, and their violation can be prevented.

(ii) Communicate to the Personal Information Owner the Information Processing policies that will be applicable to his/her Personal Information.

(iii) Explain the manner in which their Personal Information can be accessed, as well as how to determine how this information will be Processed, and what its use will then be.

111. SCOPE OF APPLICATION.

The present policies will be applied to the Processing of Personal Information in Colombia, or whenever legislation is applicable to the Responsible Party and/or Processor located outside of Colombia, under international treaties, contractual relations, among others.

The principles and stipulations contained in these Personal Information policies will apply to any database containing Personal Information in Celsia's custody, whether as the Responsible Party and/or Processor.

All of the organizational processes at Celsia that involve the Processing of Personal Information must subject themselves to the dispositions of these policies.

IV. POLICY RECIPIENTS.

The present policies are applicable to, and thus obligate, the following persons:

4.1. All internal Celsia personnel, legal representatives, be they directors or not, who have custody of, or process, Databases that contain Personal Information.

4.2. Contractors and natural and legal persons that provide services to Celsia under any kind of contractual arrangement, and as part of which the Processing of Personal Information of any kind is carried out.

4.3. Other persons established by Law.

V. PRINCIPLES APPLICABLE TO PERSONAL INFORMATION PROCESSING.

The protection of Personal Information at Celsia will be subjected to the following principles or fundamental rules, based on those established in the internal processes related to the

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Processing of Personal Information, and shall be interpreted in a harmonious, comprehensive, and systematic manner with all Laws of Colombia.

5.1. Informed consent or principle of freedom.

The Processing of Personal Information at Celsia can only be done with the express, informed, and previous consent of the Owner in accordance with Law 1581 of 2012, and Decree 1377 of 2013. Personal Information may not be obtained, processed, or divulged without the authorization of the Owner, except for a legal or judicial mandate that replaces the consent of the Owner.

5.2. Legality.

The Processing to which Law 1581 of 2012 refers to, is a regulated activity that must be subjected to what is established therein, as well as any other dispositions that develop it.

5.3. Use of Personal Information.

Processing of Personal Information must be for a legitimate purpose, in accordance to the Constitution and the Law. It must be informed to the Owner of the Personal Information, as established in Law 1581 and its Regulatory Decree.

5.4. Veracity or quality of the Personal Information.

The Personal Information collected by Celsia must be truthful, complete, exact, provable, understandable, and must remain updated. Processing of partial, incomplete, fragmented, or misleading information is prohibited.

5.5. Transparency.

In the Processing of Personal Information, the right of the Owner to obtain and learn of the existence of Personal Information concerning him/her from the Responsible Party and/or Processor, at any time and without restrictions, will be guaranteed.

5.6. Relevance of the Personal Information.

In the gathering of Personal Information by Celsia, the purpose of the Processing and/or Database must be considered; therefore, the data must be adequate, relevant, and non-excessive or disproportionate with regards to said purpose. The collection of disproportionate Personal Information with regards to the purpose for which it is obtained, is prohibited.

5.7. Restricted access and circulation.

Personal Information collected or processed by Celsia shall be used by the Company exclusively within the stated purposes, and the authority granted by the Owner of the Personal Information.

Personal Information in the custody of Celsia cannot be available on the Internet or on any other massive propagation media, unless the access is technically controllable and safe, and for the only purpose of providing restricted knowledge to the Owners or authorized third parties, in accordance to the dispositions of the Law and the principles that govern the matter.

5.8. Temporality of the Personal Information.

Once the purpose for which the Personal Information was collected and/or processed by Celsia has concluded, its use must conclude, and all pertinent security measures will therefore be

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adopted. For this purpose, the commercial Law obligations regarding the matter of preservation of ledgers of commerce and merchant correspondence, must be considered.

5.9. Security of the Personal Information.

Celsia, as Party Responsible or Processor of Personal Information, as the case may be, will adopt the physical, technological, and/or administrative safety measures that may be necessary for guaranteeing the attributes of integrity, authenticity, and trust worthiness of the Personal Information. The Company, in accordance to the classification of the Personal Information, shall implement high, medium, or low security measures, as the case may be, so as to avoid unauthorized or fraudulent adulteration, loss, leakage, consultation, use, or access.

5.10.

Celsia, and every person that intervenes in the Processing of Personal Information, has the professional obligation to keep and maintain the privacy of said information, including after ending their relationship with some tasks that include Processing, being able to only supply or communicate Personal Information when this is necessary for the development of the activities authorized by Law, and in the terms expressed therein. Celsia will implement Information protection clauses in this regard in all of its contractual relationships.

5.11. Right to Information.

Celsia shall inform the Personal Information Owners, as well as the Parties Responsible and the Processors, about the data protection regime adopted by the Organization, as well as the purpose and other principles that regulate the Processing of this data. Similarly, it shall inform the existence of the Personal Information Databases that are in its custody, the rights and Habeas Data y the Personal Information Owners, proceeding with the registration required by Law and the Regulatory Decree.

5.12. Special protection of Sensitive Information.

Celsia will not process or gather Personal Information related exclusively to political ideologies, labor union membership, religious beliefs, sex life, ethnic origin, and health, unless expressly authorized to do so by the Owner and in those legal cases where consent is not required. Sensitive personal Information that may be obtained in a recruitment process will be protected via appropriate high security measures.

VI. RIGHTS OF THE INFORMATION OWNERS.

Personal Information Owners contained in the Personal Information databases in Celsia's information systems have recourse to the rights set out in this section, in compliance with the fundamental rights enshrined in the Political Constitution and in the Law.

Exercise of these rights shall be free and unlimited by the Personal Information Owner, without prejudice to the legal dispositions that regulate the exercise of said rights.

The exercise of Habeas Data, expressed in the following rights, constitutes a highly personal power, and will be exercised exclusively by the Information Owner, save for legal exceptions.

6.1. Right to access.

This right constitutes the power of the Personal Information Owner to obtain, free of cost, partially or completely, all information relating to his/her Personal Information, the Processing thereof, the

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Processing purpose, the location of the Databases that contain their Personal Information, and communications and/or disclosures made with respect to them, be they authorized or not.

6.2. Updating right.

This right constitutes the power of the Personal Information Owner to update his/her Personal Information after it has been altered in any way.

6.3. Rectification right.

This right constitutes the power of the Personal Information Owner to modify Personal Information that is inexact, incomplete, or non-existent.

6.4. Cancellation right.

This right constitutes the power of the Personal Information Owner to cancel said information, or suppress it when it is excessive, not pertinent, or the Processing is contrary to norms, unless in cases in which they are considered as exceptions, or that they are required, by Law and/or necessary within a specific contractual framework.

In the case of a cancellation request for the Processing of Personal Information related to the provision of electrical energy, the Company will indicate that without said authorization Celsia could not have it in its Database and, therefore, the provision of electrical energy could not be provided.

6.5. Right to revoke consent.

The Personal Information Owner has the right to revoke his/her consent, or the authority that enabled Celsia to Process the information for a determined purpose, except for those cases considered as exceptions by Law and/or it is necessary within a specific contractual framework.

In the case of a request to revoke authority for the Processing of Personal Information related to the provision of electrical energy, the Company will indicate that without said authorization Celsia could not have it in its Database and, therefore, the provision of electrical energy could not be provided.

6.6. Right of objection.

This right constitutes the power of the Personal Information Owner to object to the Processing of his/her Personal Information, except for cases in which said right does not correspond due to legal disposition or because it violates general interests greater than the interests of the Owner. Celsia, based on the legitimate rights argued by the Personal Information Owner, shall make a judgment of proportionality or deliberation for the purpose of determining the preeminence or not of the particular right of the Personal Information Owner regarding his/her rights, samples, and right of information.

In the case of an objection to the Processing of Personal Information related to the provision of electrical energy, the Company will indicate that without said authorization Celsia could not have it in its Database and, therefore, the provision of electrical energy could not be provided.

6.7. Right to lodge claims and grievances or to start proceedings.

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The Personal Information Owner has the right to present to the Superintendence of Industry and Commerce, or the competent entity, claims and grievances, as well as any pertinent actions for the protection of his/her data, once all consultation or grievance formalities have been made to the Party Responsible for the Processing or the Processor. Celsia will answer all requests made by the competent authorities related to these rights of the Personal Information Owner.

6.8. Right to grant authority for the Processing of data.

Under development of the principle of informed consent, the Owner of the data has the right to grant authorization for the processing of his/her Personal Information to Celsia.

As an exception, this authorization will not be required in the following cases:

6.8.1. When it is requested by a public or administrative entity in accordance to their legal functions, or through a court order.

6.8.2. In the case of Public Information.

6.8.3. In the case of a medical or health emergency.

6.8.4. When the Processing of Information is authorized by Law for historical, statistical, or scientific purposes.

6.8.5. In the case of Personal Information related to the Civil Registry of persons.

6.8.6. Databases and archives whose purpose is the security and defense of the nation, as well as the prevention, detection, monitoring, and control of money laundering and terrorist financing.

6.8.7. Databases whose purpose is the storage of intelligence and counterintelligence information;

6.8.8. Databases and archives of journalistic information and other editorial contents;

6.8.9. Databases and archives regulated by Law 1266 of 2008; and

6.8.10. Databases and archives regulated by Law 79 of 1993.

In these cases, though the Owner's authorization is not required, the remaining legal provisions and principles governing the protection of Personal Information will prevail.

VII. RESPONSIBILITIES OF POLICY RECIPIENTS REGARDING DATABASES CONTAINING PERSONAL INFORMATION WHEN ACTING AS RESPONSIBLE PARTIES AND PROCESSORS.

7.1. Duties for the Parties Responsible of Processing.

When Celsia or any of the recipients of these policies take on the quality of Parties Responsible of Processing of Personal Information in their custody, they shall have to comply with the following responsibilities, without prejudice to additional legal or other provisions governing their activity:

a) Guarantee the Personal Information Owner the full and effective exercise of the right to Habeas Data, at all times.

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- b) Request and conserve, in the conditions provided for by Law 1581 of 2012 and Decree 1377 of 2013, a copy of the relevant authorization and consent granted by the Personal Information Owner.
- c) Duly inform the Personal Information Owner of the purpose of collection and the rights applicable to him/her as part of the authorization granted.
- d) Conserve the Personal Information under the necessary security conditions so as to impede its unauthorized or fraudulent adulteration, loss, consultation, use, or access.
- e) Guarantee that the information submitted to the Processor is truthful, complete, accurate, up-to-date, verifiable, and understandable.
- f) Update the information, informing the Processor in a timely manner of all developments with respect to the information previously submitted, and adopt the remaining measures necessary for the information submitted to be kept up-to-date.
- g) Correct the information when it is incorrect, and inform the Processor of all relevant changes.
- h) Supply the Processor, as the case may be, only information that can be Processed by previous authorization, in accordance to what is established by Law.
- i) Demand at all times that the Processor respect the conditions of security and privacy related to the information of the Owner.
- j) Process the inquiries and grievances lodged under the terms set out in these policies, and in Law 1581 of 2012.
- k) Adopt an internal handbook of policies and procedures to guarantee due compliance with the Law and, in particular, to address inquiries and grievances.
- l) Notify the Processor where Information provided is called into question by the Owner, once the grievance has been submitted and prior to completion of the relevant procedure.
- m) Inform on behalf of the Personal Information Owner any use given to said information.
- n) Notify the information protection authority when security code violations occur, and when there are risks to the administration of the information of the Personal Information Owners.
- o) Comply with instructions and requirements issued by the Superintendence of Industry and Commerce, or by the competent authority in this matter.

7.2. Responsibilities of the Personal Information Processors

When Celsia or any of the recipients of these policies act as Responsible Parties of Personal Information, they must comply with the following duties, without prejudice to additional legal or other provisions governing their activity:

- a) Guarantee the Owner, at all times, the full and effective exercise of the right to Habeas Data.

- b) Conserve information under the necessary security conditions to impede its unauthorized or fraudulent adulteration, loss, consultation, use or access.
- c) Update, rectify, or suppress the Personal Information in a timely fashion under the terms of Law 1581 of 2012, and Decree 1377 of 2013.
- d) Update the information reported by the Responsible Parties within five (5) business days from its receipt.
- e) Process all inquiries and grievances formulated by the Owners under the terms indicated in these policies, in Law 1581 of 2012, and Decree 1377 of 2013.
- f) Adopt an internal manual of policies and procedures to guarantee due compliance with Law 1581 of 2012, and Decree 1377 of 2013, and, in particular, to respond to inquiries and grievances from Personal Information Owners.
- g) Include the phrase "response to grievance pending" in the database as regulated by Law 1581 of 2012, and Decree 1377 of 2013, with respect to unresolved Complaints or Grievances submitted by Personal Information Owners.
- h) Include the phrase "information subject to legal dispute" in the Databases once notified by the competent authority on judicial processes related to the quality of the Personal Information.
- i) Abstain from circulating information that is called into question by the Owner, and whose blocking has been ordered by the Superintendence of Industry and Commerce in accordance to what is established in Law 1581 of 2012, and Decree 1377 of 2013.
- j) Only allow access to the information to those persons who can have access to it.
- k) Notify the Superintendence of Industry and Commerce when security code violations occur, and when there are risks to the administration of the Owner's information.
- l) Comply with instructions and requirements issued by the Superintendence of Industry and Commerce.

7.3. Common responsibilities of Parties Responsible and Processors.

Besides the responsibilities previously described for Celsia and any other person that assumes the condition of Party Responsible or Processor, they will assume in a supplementary fashion the following responsibilities whatever their condition may be:

- a) Apply the security measures in accordance to the Personal Information classification dealt with by Celsia.
- b) Adopt disaster recovery processes that are applicable to the Databases that contain Personal Information.
- c) Adopt Database Backup procedures for the Databases that contain Personal Information.
- d) Periodically audit compliance of these policies on behalf of the recipients of said policies.

- e) Safely manage the Databases that contain Personal Information.
- f) Keep a central record of the Databases that contain Personal Information, including a history of said information from its creation, information Processing, and cancellation of the Databases.
- g) Safely manage access to the Personal Information Databases contained in the information systems, in which he/she acts as Party Responsible or Processor.
- h) Have a procedure for managing security incidents regarding Databases that contain Personal Information.
- i) Regulate access to Databases that contain Personal Information in third party contracts

VIII. HABEAS DATA PROCEDURE FOR EXERCISING INFORMATION, ACCESS, UPDATING, RECTIFICATION, CANCELLATION, AND OBJECTION RIGHTS. Under development of the constitutional guarantee of Habeas Data regarding the access, updating, rectification, cancellation, and objection rights by Personal Information Owners, or legally enabled interested parties, this is, successors and legal representatives, Celsia adopts the following procedure:

8.1. The data Owner and/or interested party of one of these rights, shall accredit this condition through a copy of the pertinent document and his/her document of identification that they can supply physically or digitally. In case the Owner is represented by a third party, the corresponding power of attorney, which must be recognized by a notary public, must be included. The guardian must also accredit his/her identification in the indicated terms.

8.2. The request to exercise any of the aforementioned rights shall have to be made in writing, be it in physical or digital form. The request to exercise the aforementioned rights may be directed to the principle address of Celsia, located at calle 15, No. 29B-30 Cali Yumbo (Yumbo) highway, or to the Commercial Offices and Attention and Payment Points of Celsia located in the different municipalities of the Valle del Cauca, or to the following email servicioalcliente@CELSIA.com.co. Celsia may make other means available, at its own discretion, for the Personal Information Owner to exercise his/her rights.

8.3. The request to exercise any of the above-mentioned rights will contain the following information:

8.3.1. Name of the Personal Information Owner or his/her representatives, as the case may be.

8.3.2. Concrete and precise request of information, access, updating, rectification, cancellation, objection, or revoking of consent. In each case, the petition shall be well-grounded so that Celsia can proceed to respond as the Party Responsible for the Personal Information database.

8.3.3. Physical and/or email address for notifications.

8.3.4. Documents that support the request.

8.3.5. Signature of the request by the Personal Information Owner.

(i) If any of the requirements indicated herein are missing, Celsia will notify the interested party of this within five (5) days following receipt of the request so that this can be corrected. If two (2) months elapse without submission of the requested information, the request will be understood as canceled. Celsia may make available physical and/or digital forms for the

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exercise of this right, and indicate therein whether the interested party is submitting an inquiry or a grievance.

(ii) Within two (2) business days after receipt of the request in full, Celsia will indicate that a response to the grievance is pending. A box in the Database shall be assigned in which the following phrases are indicated: "Response to grievance pending" and "Grievance resolved".

(iii) Celsia, when acting as the Party Responsible of the Personal Information Database in its information systems, will respond to the request within a term of ten (10) business days in the case of an inquiry, and fifteen (15) days in the case of a grievance. In the same manner, Celsia will make an announcement upon verification that its information systems do not contain Personal Information belonging to the interested party exercising one of the aforementioned rights.

(iv) In the case of an inquiry, if it isn't possible to give an answer at the end of the ten (10) business days, the interested party shall be informed of the reasons for the delay, and the date in which the claim will be seen. This period of time can in no case exceed the five (5) business days following the first ten (10) business days.

(iv) In the case of a grievance, if it isn't possible to give an answer at the end of the fifteen (15) business days, the interested party shall be informed of the reasons for the delay, and the date in which the claim will be seen. This period of time can in no case exceed the eight (8) business days following the first fifteen (15) business days.

(v) Celsia, in cases where it holds the condition of Processor shall inform the Personal Information Owner or interested party regarding the situation, and will communicate the request to the Party Responsible for the Personal Information so that this person answer the inquiry or grievance request presented. A copy of this communication shall be sent to the Personal Information Owner or interested party, so that they are aware of the identity of the Party Responsible for the Personal Information and, as a consequence, the principle person in charge of guaranteeing the exercise of his/her right.

(vi) Celsia will document and store requests submitted by Personal Information Owners or interested parties in the exercise of any of the rights, as well as the responses to these requests. This information shall be treated in accordance to all norms applicable to the Organization's correspondence.

(vii) All prior formalities regarding inquiries and/or grievances described herein must be exhausted so as to be able to resort to the Superintendence of Industry and Commerce in exercise of the legal actions contemplated by the Personal Information Owners or interested parties.

IX. PROCESSING OF PERSONAL INFORMATION.

Those operations that require Celsia to Process Personal Information, as the Responsible Party or Processor, will be governed by the following parameters and will have the following purposes.

9.1. Personal Information related to Human Resources Management.

9.1.1. Processing of Personal Information before the contractual labor relationship.

Celsia will treat all Personal Information of its employees, as well as the personal information

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of those that apply to vacancies, in three opportunities, being: before, during, and after the labor and/or services relationship.

Celsia will notify ahead of time those persons interested in participating in a selection process of the rules applicable to the Processing of Personal Information provided by the interested party, and with respect to that obtained during the selection process.

Once the selection process is concluded, Celsia shall inform the negative result and shall give the non-selected candidates the supplied Personal Information, unless the Personal Information Owners authorize in writing the destruction of said information when the Personal Information Owner is not selected. The information gathered by Celsia regarding those that were not selected, results of psycho-technical tests, and interviews, shall be eliminated from the information systems, thus complying with the principle of the purpose.

When Celsia hires third party selection processes, the Processes Information Processes that need to be applied to information provided by the interested parties, must be regulated in the contracts, as well as the personal information gathered from the respective process.

The Personal Information and data obtained in the selection process regarding the selected personnel for working in Celsia, shall be stored in the personal file, applying high levels and measures of security to this information, considering the fact that the information in question may possible contain sensitive data.

The purpose of providing the data given by the parties interested in vacancies at Celsia, and the personal information obtained in the selection process, is limited to the participation in said process; therefore, any other use of this information is prohibited.

9.1.2. Processing of information during the contractual relationship. Celsia shall store the Personal Information and personal data obtained from the selection process of its employees in a file identified with the name of each one of them. This physical or digital file shall only be accredited and managed by Human Resources for the purpose of managing the contractual relationship between Celsia and the employee.

The Processing that ESPA will give the Personal Information shall have the purpose of complying with the obligations derived from the contractual relationship including, but not limited to, management of personnel involving, among others, payment and payroll management (salaries, legal and extralegal social provisions, benefits, bonuses, reimbursements, insurances, making all reductions authorized by Law, by judicial authority, or by the employee); make the contributions to the Comprehensive Social Security System; the assignment of work elements such as communications and computer equipment, work stations, emails, and others that may be required according to the particularities of each position; the contracting of insurances; personnel development; guarantee the safety and health of its employees; ensure compliance with the obligations of confidentiality and other labor obligations; guarantee the right to free association; contact family members when necessary; the emission of work certificates, advertising campaigns for subjects related to the company; identification by security and image; for internal and external audits. Similarly, any other purpose that is compatible and can be considered analogous to those indicated.

Use of employee information for purposes other than the administration of the contractual relationship is strictly prohibited at Celsia. Any other different use of employee data and personal information shall only be possible by order of the competent authority, if and only if said authority has the faculties to do so. The aforementioned except for prior and written authority that documents the consent of the Personal Information Titular or legal disposition regarding the matter.

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9.1.3. Processing of information after employment termination. Once the labor relationship ends, whatever the cause may be, Celsia shall proceed to store the Personal Information obtained from the selection process, and any documentation generated in the development of the labor relationship, in a central archive, submitting said information to high levels and measures of security, considering the possibility that this information may contain Sensitive Information.

The Personal Information of ex-employees and/or retirees, shall have the purpose of complying with the obligations derived from the labor relationship that existed including, but not limited to, the emission of labor certifications; recognition of pensions and/or pension substitutes; emission of certificates for pension bond settlements; certifications for charges and payment of installments of pension parts; actuarial calculations; recognition of benefits, and for internal and external audits.

Celsia is forbidden from ceding this information to third parties, because this fact could constitute a bypass of the purpose for which the Titular's Personal Information was provided. The aforementioned, except for the previous and written authorization that documents the consent by the Personal Information Titular, or any legal disposition on the matter.

9.2. Processing of shareholder Personal Information. The Personal Information of Company shareholders shall be considered privileged information, because this same information is recorded in the commerce ledgers and are considered to be reserved by legal dispositions. Therefore, access to said information will be granted according to the norms contained in the Code of Commerce, Law 963 of 2005, Decree 2555 of 2012, and other norms that are applicable to this matter, including the public securities market. Celsia shall only use the Personal Information of shareholders for purposes derived from the existing statutory relationship.

9.3. Processing of supplier Personal Information. Celsia shall only gather Personal Information from its suppliers that is necessary, pertinent, and non-excessive for the purpose of selection, assessment, and execution of the contract entered into. When, due to a judicial nature Celsia is required to divulge the data of the supplier physical person due to a contracting process, this will be done with the provisions that comply with what is established in these policies, and that warn third parties about the purpose of the information divulged.

Celsia shall gather from its suppliers the Personal Information of its employees, that is necessary, pertinent, and non-excessive, that for security reasons must be analyzed and assessed, considering the characteristics of the services that are contracted with the supplier. The Personal Information of the employees of the suppliers that is gathered by Celsia, shall only be used to verify the moral suitability and competence of the employees; therefore, once this requirement is verified, Celsia will be able to return the information to the supplier, except for instances where the preservation of this information is necessary.

When Celsia provides Personal Information of the employees of its suppliers, these employees must protect the supplied Personal Information in accordance to what is established in these policies. The prevision of an audit shall be included to the contract or document that legitimizes the delivery of the Personal Information for these effects. Celsia shall verify that the data requested is necessary, pertinent, and non-excessive with regards to the purpose that sustains the request of access to said information.

9.4. Processing of Personal Information in hiring processes. Third parties that access, use, deal with, and/or store Personal Information of Celsia employees related to hiring processes, alliances, and agreements of cooperation with Celsia and/or third parties related to said hiring processes, shall adopt wherever pertinent what is established in these policies, as well as any safety measures indicated by Celsia according to the type of personal information in question.

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The prevision of an audit shall be included to the contract or document that legitimizes the delivery of the Personal Information for these effects. Celsia shall verify that the data requested is necessary, pertinent, and non-excessive with regards to the purpose of the Processing.

9.5. Processing of Personal Information of clients or users of electrical energy public utilities supplied by Celsia. The Personal Information contained in the Company Databases whose Processing is related to providing an electrical energy service and with charges that are allowed to be made through invoicing by the Owner, shall have the following purposes: (i) the reading of meters of the service users; (ii) the invoicing and collections for the services of electrical energy, public lighting, and maintenance services and which are expressly authorized by the Owner; (iii) take on the management of charging for the electrical energy service; (iv) sending and sales of Company products and services (e.g. promotions, advertising campaigns, events, contests, Multiservice sales, offers, etc.); (v) the execution of surveys, studies, and market investigations; and (vi) in general, everything necessary for the proper delivery of the electrical energy service, in accordance with Laws 142 and 143 of 1994.

9.6. Processing of Personal Information of the community in general. The gathering of Personal Information of natural persons that Celsia deals with in the development of actions related to the community, be they the consequence of business social responsibility or any other activity, shall be subject to what is established in these policies. To this end, Celsia will previously notify and seek authorization from the Personal Information Owners contained in the documents and instruments it utilizes for this effect and related to those activities.

In each of the aforementioned cases, the departments of the Organization that carry out the business processes involving Personal Information must factor the formulation of rules and procedures into its action strategies to comply with and to enforce the policies adopted herein, as well as to prevent possible legal sanctions.

X. PROHIBITIONS.

The following prohibitions and sanctions are established in the development of these information security policies as consequences for their non-compliance.

10.1. Celsia prohibits the access, use, management, cession, communication, storage, and any other sensitive Personal Information Process without the authority of the Personal Information Owner and/or Celsia.

- Noncompliance with this prohibition by Celsia employees will be regarded as a serious breach that may lead to the termination of employment. The aforementioned without prejudice to the legal actions that may result.

- Noncompliance with this prohibition by suppliers that have entered into contracts with Celsia will be regarded as a serious reason to terminate the contract, without prejudice to any further action that may be taken.

In contracts with suppliers where the contractual object is related to Personal Information, a precautionary measure will be agreed relating to the damages that Celsia may incur as a result of fines, operating penalties, etc. imposed by competent authorities on account of imprudent or negligent actions on the part of the supplier.

10.2. Celsia prohibits the cession, communication, or circulation of Personal Information without express, prior, written consent by the Personal Information Owner or without the authorization of Celsia. Cession or communication of Personal Information shall be inscribed

in the Personal Information central registry of Celsia, and shall have the authorization of the Databases Custodian.

10.3. Celsia prohibits the access, use, cession, communication, Processing, storage, and any other sensitive Personal Information Processing that may be identified during an audit procedure applied according to the norm regarding good use of the Organization's information resources, and/or other norms, and/or policies implemented by Celsia for these effects.

Sensitive Information that is identified shall be informed to the Owner of said information for the purpose of eliminating them; if this option is not possible, Celsia shall proceed to eliminate them in a safe fashion.

10.4. Celsia prohibits any Personal Data Protection Processes for the recipients of these policies that could give place to any one of the conducts described in the cyber-crimes Law 1273 of 2009.

10.5. Celsia prohibits the Processing of Personal Information of Children and Adolescents that are minors, except for cases of express authority by their legal representatives. All Processing that is done regarding the information of minors will have to consider guaranteeing the rights of these prevalent in the Political Constitution, in harmony with the Code of Infants and Adolescence.

XI. INTERNATIONAL TRANSFERENCE OF INFORMATION.

Transference of Personal Information to countries that do not provide adequate levels of data protection, is prohibited. Safe countries are considered to be those that comply with the standards established by the Superintendence of Industry and Commerce.

International data Transferences may be exceptionally done by Celsia when:

11.1. The data Titular has granted express, prior, and unequivocal authority to proceed with the Transference.

11.2. The transference is necessary for the execution of a contract between the Owner and Celsia as Party Responsible and/or Processor.

11.3. They are banking and securities Transferences in accordance to the legislation applicable to said transactions.

11.4. It is the Transference of data within the framework of international treaties that are part of the Colombian legal system.

11.5. Transferences legally required for safeguarding a public interest.

When an international Transference of Personal Information is presented, prior sending and receiving said information, Celsia shall subscribe the agreements that regulate in a detailed manner the obligations, burdens, and responsibilities that should appear for the intervening parties.

The agreements or contracts signed must address the stipulations of these policies as well as any legislation and jurisprudence applicable to the matter of protection of Personal Information.

XII. ROLES AND RESPONSIBILITIES IN THE PROTECTION OF PERSONAL INFORMATION.

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All employees and administrators are responsible for the proper Processing of Personal Information within Celsia.

In consequence, each area that manages business processes that involve Processing Personal Information must adopt the rules and procedures for the application of and compliance with these policies, given their status as Custodians of Personal Information that is contained in Celsia's information systems.

If there is any doubt regarding the Processing of Personal Information, the department responsible for information security and/or the Legal Department should be consulted to ascertain the guidelines to be followed for the case in hand.

XIII. TEMPORALITY OF THE PERSONAL INFORMATION.

In the Personal Information Processing carried out by Celsia, the permanence of the data in Celsia's information systems shall be determined for the purpose of said Processing. As a consequence, once the purpose for which the data was gathered is concluded, Celsia shall proceed with its destruction or return, whatever the case may be, or its preservation according to what is established in the Law, adopting all technical measures that block an inadequate Process.

XIV. SAFETY MEASURES.

In the Processing of Personal Information subject to regulation in these policies, Celsia will adopt physical, logistical, and administrative security measures, which are classified as high, medium, or low level depending on the risk that may stem from the important nature of the Personal Information used.

In development of the principle of Security of Personal Information, Celsia will adopt a general guideline regarding these measures, the compliance of which will be mandatory for all recipients of these policies.

Recipients of these policies are obliged to notify Celsia of any suspicion of a possible violation of the security measures adopted by the Organization to protect the Personal Information entrusted to it, as well as any improper Processing thereof, as soon as they become aware of it.

In these cases, Celsia will notify the controlling authority of the situation and will proceed to handle the security incident regarding the Personal Information, so as to establish the applicable legal implications, whether criminal, labor, disciplinary, or civil.

XV. PROCEDURES AND SANCTIONS.

Celsia will inform the recipients of these policies of the sanctions regime contemplated in article 23 of Law 1581 of 2012, which sets out the risks assumed on account of improper Processing of Personal Information:

"ARTICLE 23. Sanctions. The Superintendence of Industry and Commerce may impose the following sanctions to the Parties Responsible Parties and Processors:

- a) Individual and company fines up to the equivalent of two thousand (2,000) legal minimum monthly salaries in force when the sanction is imposed. Fines may be successive for such time as noncompliance persists.
- b) Suspension of Processing activities for a period of up to six (6) months. The corrective measures that must be adopted shall be indicated in the suspension act.
- c) Temporary cessation of Processing operations if the corrective measures ordered by the Superintendence of Industry and Commerce have not been adopted by the end of the suspension period.
- d) Immediate and definitive cessation of the operation involving the Processing of sensitive Information."

The notification of any investigative procedure by any authority related to the Processing of Personal Information must be reported immediately to the Company Legal Department so as to take all measures tending towards deferring the actions of the entity and to avoiding the imposition of sanctions provided for in Colombian legislation, especially those stipulated in Title VI, Chapter 3, of Law 1581 of 2012.

As a consequence of the risks assumed by Celsia in its capacity as Responsible Party and/or Processor of Personal Information, non-compliance with these policies by its recipients is considered a serious breach and may give rise to the termination of the contract in question, without prejudice to further admissible legal action.

XVI. SUBMISSION OF PERSONAL INFORMATION TO AUTHORITIES.

When State authorities ask Celsia for access to and/or submission of Personal Information contained in any of its Databases, the legality of the request and the relevance of the information requested with respect to the purpose stated by the authority will be verified. Also, the submission of personal information requested will be documented, ensuring that it complies with all requirements (authenticity, reliability, and integrity), and warning both the employee making the request, and whomever receives its, as well as the entity for whom the work. The authority requesting the personal Information will be notified of security measures that apply to the Personal Information submitted and the risks implied by its misuse and improper Processing.

Contents of the procedure shall be adapted at all times to the current dispositions regarding matters of personal information security.

CHANGE CONTROL

VERSION	DATE	JUSTIFICATION FOR THIS VERSION
1	11/05/2015	Document creation