

Personal Data Processing Policy

VENTOLINI S.A.S

ARTICLE 1. PURPOSE

In compliance with Law 1581 of 2012, Regulatory Decree 1377 of 2013, Decree 1074 of 2015, and all other regulations that amend, supplement, or regulate them, aimed at governing the processing of personal data of natural and legal persons (hereinafter, the “Data Subjects”) by **FÁBRICA DE ALIMENTOS PROCESADOS VENTOLINI S.A.S** (hereinafter, “VENTOLINI”), this Personal Data Processing Policy (the “Policy”) is adopted.

The purpose of this Policy is to inform Data Subjects whose personal data are processed by VENTOLINI of their rights, the procedures established to exercise those rights, and the purposes for which their data will be processed upon granting prior, express, and informed authorization.

ARTICLE 2. APPLICATION AND SCOPE

VENTOLINI carries out operations that require the collection of personal data from natural and legal persons with whom it maintains contractual and/or commercial relationships. Accordingly, it is necessary to collect and process such information from individuals including, but not limited to, customers, minors, the general public, suppliers, contractors, employees, and individuals in the process of entering into any contractual relationship with VENTOLINI, in order to properly carry out its corporate, administrative, and commercial activities.

VENTOLINI may amend this Policy at any time it deems necessary.

ARTICLE 3. DEFINITIONS

For the purposes of this Policy:

- **Authorization:** Prior, express, and informed consent granted by the Data Subject for the processing of personal data.
- **Privacy Notice:** Oral or written communication issued by VENTOLINI to the Data Subject informing them of the existence of applicable data processing policies, how to access them, and the purposes of the processing.
- **Database:** An organized set of personal data subject to processing, which may be stored in digital, paper, video, biometric, audio, or other formats.
- **Personal Data:** Any information linked or that may be associated with one or more identified or identifiable natural persons.
- **Private Data:** Data of an intimate or confidential nature, relevant only to the Data Subject.
- **Semi-Private Data:** Data that is neither intimate nor public, the disclosure of which may interest the Data Subject and a specific group or society at large (e.g., financial or credit data).

- **Public Data:** Data classified as public by law or the Constitution, including civil status, profession, or data contained in public records.
- **Sensitive Data:** Data that affects the privacy of the Data Subject or may lead to discrimination, including racial or ethnic origin, political opinions, religious beliefs, union membership, health data, sexual life, and biometric data.
- **Data Protection Officer:** Natural or legal person designated by VENTOLINI to oversee compliance with this Policy and applicable data protection laws.
- **Data Controller:** Natural or legal person that decides on the database and/or processing of personal data.
- **Data Processor:** Natural or legal person that processes personal data on behalf of the Data Controller.
- **Data Subject:** Natural person whose personal data is processed.
- **Processing:** Any operation performed on personal data, such as collection, storage, use, circulation, or deletion.
- **Transfer:** Transmission of personal data from a Controller or Processor located in Colombia to another Controller inside or outside the country.
- **Transmission:** Communication of personal data to a Processor for processing on behalf of the Controller, inside or outside Colombia.

ARTICLE 4. PRINCIPLES

Personal data processing by VENTOLINI shall comply with the principles of legality, purpose limitation, freedom, accuracy, transparency, restricted access and circulation, security, confidentiality, and duty of information, as established under Colombian law.

By accessing, browsing, or interacting with the website, the Data Subject freely, voluntarily, expressly, and unequivocally authorizes the processing of the personal data requested and necessary for VENTOLINI's commercial and contractual relationships.

ARTICLE 5. IDENTIFICATION OF THE DATA CONTROLLER

- **Controller:** FÁBRICA DE ALIMENTOS PROCESADOS VENTOLINI S.A.S
- **Tax ID (NIT):** 800.065.567-5
- **Registered Office:** Cali, Valle del Cauca, Colombia
- **Address:** Calle 31 #08-31
- **Email:** info@ventolini.com
- **Phone:** +57 310 315 8177

ARTICLE 6. DATA SUBJECT REQUESTS AND CLAIMS

VENTOLINI appoints **Natalia Sardi Vernaza** as the person responsible for handling and monitoring requests related to the processing of personal data and for ensuring compliance with applicable laws.

ARTICLE 7. DATA PROCESSING

Personal data may be processed manually, digitally, and/or automatically and includes collection, storage, organization, use, circulation, transmission, transfer, updating, rectification, deletion, and any other operation consistent with the purposes authorized by the Data Subject.

ARTICLE 8. DATABASE CONTENT

VENTOLINI databases may contain general information such as full name, identification, gender, contact information, and, where applicable, sensitive data and data of minors, subject to legal authorization.

ARTICLE 9. USE OF PERSONAL DATA

Personal data may be processed for the following groups, among others:

- Employees and contractors
- Children, adolescents, and their legal guardians
- Family members of employees
- Customers
- Suppliers
- Job applicants
- General public

Processing includes commercial, administrative, marketing, customer service, legal compliance, and statistical purposes.

ARTICLE 10. PURPOSES OF DATA COLLECTION AND USE

VENTOLINI may collect and process:

- Contact and identification data
- Financial and payment information
- Order and transaction history
- Demographic information
- Images, photographs, videos, and interviews for marketing purposes

VENTOLINI does **not** collect sensitive data except as legally permitted.

ARTICLE 11-15. DATA OF MINORS AND VENTOLINI FRIENDS CLUB

Data of minors is processed only when permitted by law, with parental authorization, and respecting the best interests of children. Data collected through the **VENTOLINI Friends Club** will be used for educational, recreational, and loyalty purposes and retained as legally required.

ARTICLE 16. SENSITIVE DATA

Sensitive data will only be processed in accordance with legal exceptions and with explicit authorization where required.

ARTICLE 17. AUTHORIZATION

Authorization may be granted in writing, verbally, or through unequivocal conduct. Authorization is not required in cases expressly permitted by law.

ARTICLE 18. DATA TRANSFER AND TRANSMISSION

International data transfers are prohibited to countries without adequate data protection levels, except in legally permitted cases.

ARTICLE 19. DATA SUBJECT RIGHTS

Data Subjects have the right to access, update, rectify, delete, revoke authorization, request proof of authorization, and file complaints with the Superintendence of Industry and Commerce.

ARTICLE 20. PROCEDURE TO EXERCISE RIGHTS

Requests and claims may be submitted via **info@ventolini.com** and will be handled within legally established timeframes.

ARTICLE 21. PRIVACY NOTICE

The Privacy Notice is permanently available at <https://ventolini.com/>.

ARTICLE 22. SARLAFT

Data processed under SARLAFT (anti-money laundering and terrorism financing) systems is handled confidentially in compliance with applicable laws.

ARTICLE 23. INTEGRATION

This Policy forms an integral part of the Privacy Notice and image use authorizations.

ARTICLE 24. EFFECTIVE DATE

This Personal Data Processing Policy is effective as of **December 31, 2025**.