



PLAYA PIKUA S.A.S (hereinafter PLAYA PIKUA), Company duly constituted and identified with NIT: 901121164 - 7, located in the Department of Magdalena, Tayrona sector, in order to comply with the provisions of Articles 15 and 20 of the Political Constitution of Colombia, Law 1581 of 2012, Law 1266 of 2008, Regulatory Decree 1377 of 2013 and other concordant rules that refer to the protection of personal data, has regulated the collection, storage, use, circulation, deletion, transfer and other activities that constitute the processing of personal data, through the following:

PERSONAL DATA PROCESSING POLICY

I RESPONSIBLE FOR THE PROCESSING OF INFORMATION

The **PIKUA BEACH Company**, whose main address is located at Km 39, Via a la Guajira, Magdalena department, and info@playapikua.com email will be responsible for the processing of the personal data provided.

I MARCO JURIDICO

In order to ensure the exercise of the rights of the holders of the information, PLAYA PIKUA must adjust its commercial operation to the following rules:

- **Political constitution of Colombia.**

It establishes the fundamental premises relating to the processing of personal data as a fundamental right (Habeas Data), arising from the right to privacy enshrined in Article fifteen (15) and the right to information poured out in Article twenty (20).

- **Statutory Law 1581 of 2012.**

It constitutes the general framework for the protection of personal data in Colombia and seeks to protect the right of all people to know, update and rectify the information that rests in databases or files.

- **Regulatory Decree 1273 of 2013.**

It entails the first regulation made to Law 1581 of 2012, concerning information processing policies, in particular the authorization of the Information Holder for the Processing of his personal data, the exercise of the rights of the Information Holders and the processing of personal data.

- **Statutory Law 1266 of 2008.**

It lays down the general provisions of habeas data and regulates the handling of information contained in personal databases, in particular *financial, credit*, services and that from third countries and other provisions are issued.

- **Law 1273 of 2008.**

Through which a new protected legal good called "the protection of information and data" is created and systems used by information and communications technologies are fully preserved; prescribing criminal liability for the improper processing of personal data.



Note: Similarly, all rules governing, modifying or deroating the above rules will apply to these POLICIAS.

L gathering

The collection of personal data is given according to the destination to which it is subject, as follows:

- ✚ **Users / Guests**. Through the diligence or physical or virtual subscription of any type of form arranged for the purpose independently or integrated to other booking forms, or hosting or event services, that may be provided by PLAYA PIKUA among others. Also through the physical or virtual diligence of forms generated in advertising, loyalty, expansion or marketing campaigns, whether they are physically or virtually arranged in the links "REGISTER", "WORKWITH US", "CONTACTUS" or any other for similar purpose on the main web portal or accessory website of PLAYA PIKUA.
- ✚ **Employees**. The collection of the data of the workers of PLAYA PIKUA, are carried out from the beginning of their selection process where the use that they have given to the information provided is expressly informed, and at the time of the employment link is detailed in the employment contract what type of data to be collected and the purpose of its collection.
- ✚ **Third Parties/ Suppliers** . The collection of personal data of third parties, is carried out from the preliminary treatments and during the relationship that are sustained to any concept, detailing at each stage whether through contract, agreement or document what type of data is to be collected and the purpose of its collection.

M. PURPOSES OF THE COLLECTION OF PERSONAL DATA

The personal data provided by you to **PLAYA PIKUA** will be stored in our databases and will be used for any of the following purposes:

SHAREHOLDERS database:

- ✚ Execute the existing corporate relationship.
- ✚ Exercise the right of inspection.
- ✚ Send subpoena to ordinary and extraordinary shareholder meetings.
- ✚ Send information to the administrative entities that request it.
- ✚ Submit dividend payment information.
- ✚ Send invitations to events.
- ✚ Provide, share, send or deliver your personal data to affiliated, affiliated, or subordinate companies and/or third party collaborators, at the event that such companies require the information for corporate purposes and /or event



development.

Database of APPLICANTS, EMPLOYEES AND/OR SERVICE PROVIDERS:

- ✚ Comply with the existing employment and/or contractual relationship.
- ✚ Application of medical – occupational examinations.
- ✚ Perform processes of linking, executing and terminating the employment relationship and / or providing services.
- ✚ Develop the process of selection, evaluation, employment linkage and / or provision of services.
- ✚ Perform the social security affiliation processes of their own, spouse, children and/or parents who wish to include as beneficiaries.
- ✚ Attend internal or external audit processes.
- ✚ Provide, share, send or deliver your personal data to affiliated, affiliated, or subordinate companies of PLAYA PIKUA and/or third party collaborators, at the event that such companies require the information for contractual purposes.
- ✚ Send or notify, through any physical and/or digital means, circulars, memorandums, scheduling of work, occupational safety and health or welfare activities, among others related to the existing contractual link and the development of the social object of PLAYA PIKUA

CUSTOMER AND BOOKING Database:

- ✚ Carry out the existing contractual relationship.
- ✚ Provide/develop the required and/or offered services and events.
- ✚ Make confirmation of reservations and legalization of stays.
- ✚ Provide information about the services, events and / or promotions, or about changes that are presented therein.
- ✚ Execute quality controls and/ or satisfaction surveys regarding the services offered or provided by **PLAYA PIKUA, its** agents, delegates and / or third parties collaborators.
- ✚ Send or notify, through any means of physical and/or digital communication, commercial, advertising or promotional information about services, events and / or promotions of a commercial type, in order to promote, invite, direct, execute, inform and in general, carry out campaigns, promotions contests of a commercial or advertising nature, advanced by **PLAYA PIKUA** and / or by third parties acting on behalf **of PLAYA PIKUA.**
- ✚ Assign and/or transmit, if required, the databases, for strategic, commercial, financial, statistical, subordinate purposes, agencies, subsidiaries, third-party collaborators **of PLAYA PIKUA** and/or administrative entities of the State.
- ✚ If the method of payment will be through credits/ installment payment, to



consult credit/financial information before Datacredit and to report to the same risk center, for the linkage as a customer, granting credits, references and / or report of behavior and / or non-compliance with the agreed payments.

- ✦ In case of non-compliances, damages and / or damages caused in (a) **the merchants of PLAYA PIKUA**, carry out the collection procedures and / or monetary charges previously informed as a guarantee for the reservation.
- ✦ Make commercial references, in cases deemed relevant to the support, expansion and/or growth of the **PIKUA BEACH Society**
- ✦ The development of statistical, financial, commercial, strategic and other analyses concerning the social object of **PLAYA PIKUA**

MARKETING AND SALES Database:

- ✦ Develop the commercial management of the company **PLAYA PIKUA**.
- ✦ Provide/develop the required and/or offered services and events.
- ✦ Make confirmation of reservations and legalization of stays.
- ✦ Provide information about the services, events and / or promotions, or about changes that are presented therein.
- ✦ Execute quality controls and/ or satisfaction surveys regarding the services offered or provided by **PLAYA PIKUA**, its agents, delegates and / or third parties collaborators.
- ✦ Send or notify, through any means of physical and/or digital communication, commercial, advertising or promotional information about commercial services, events and/or promotions, in order to promote, invite, direct, execute, inform and in general, carry out campaigns, promotions or contests of a commercial or advertising nature, advanced by **PLAYA PIKUA** and / or by third parties acting on behalf of **PLAYA PIKUA**
- ✦ Assign and/or transmit, if required, the databases, for strategic, commercial, financial, statistical, subordinate purposes, agencies, subsidiaries, third-party collaborators **of PLAYA PIKUA** and/or administrative entities of the State.
- ✦ If the method of payment will be through credits/ installment payment, to consult credit/financial information before Datacredit and to report to the same risk center, for the linkage as a customer, granting credits, references and / or report of behavior and / or non-compliance with the agreed payments.
- ✦ In case of non-compliances, damages and / or damages caused in (a) **the merchants of PLAYA PIKUA**, carry out the collection procedures and / or monetary charges previously informed as a guarantee for the provision of the service.
- ✦ Make commercial references, where deemed relevant to the support, expansion and/or growth of **the company PLAYA PIKUA**
- ✦ The development of statistical, financial, commercial, strategic and other analyses concerning the social object of **PLAYA PIKUA**

EVENT Database:



- ✦ Execute the contracted service **with PLAYA PIKUA.**
- ✦ Provide/develop the required and/or offered services and events.
- ✦ Make confirmation of reservations.
- ✦ Provide information about the services, events and / or promotions, or about changes that are presented therein.
- ✦ Execute quality controls and/ or satisfaction surveys regarding the services offered or provided by **PLAYA PIKUA, its** agents, delegates and / or third parties collaborators.
- ✦ Send or notify, through any means of physical and/or digital communication, commercial, advertising or promotional information about commercial services, events and/or promotions, in order to promote, invite, direct, execute, inform and in general, carry out campaigns, promotions or contests of a commercial or advertising nature, advanced by **PLAYA PIKUA** and / or by third parties acting on behalf of **PLAYA PIKUA**
- ✦ Assign and/or transmit, if required, the databases, for strategic, commercial, financial, statistical, subordinate purposes, agencies, subsidiaries, **third-party collaborators of PLAYA PIKUA.**
- ✦ If the method of payment will be through credits/ installment payment, to consult credit/financial information before Datacredit and to report to the same risk center, for the linkage as a customer, granting credits, references and / or report of behavior and / or non-compliance with the agreed payments.
- ✦ In case of non-compliances, damages and / or damages caused in (a) **the merchants of PLAYA PIKUA,** carry out the collection procedures and / or monetary charges previously informed as a guarantee for the provision of the service.
- ✦ Make commercial references, where deemed relevant to the support, expansion and/or growth of **the company PLAYA PIKUA**
- ✦ The development of statistical, financial, commercial, strategic and other analyses concerning the social object of **PLAYA PIKUA**

SUPPLIER Database:

- ✦ Execute the existing contractual relationship.
- ✦ Develop accounting and financial management, as well as administrative and/or operational functions.
- ✦ Make any technical visits you deem relevant.
- ✦ Contact and contract new services and / or purchase of products **that PLAYA PIKUA,** requires for the normal development of its social object, administrative and / or operational functions.
- ✦ Send, assign, supply, share and deliver your personal data to subsidiaries, affiliates, or subordinates **of PLAYA PIKUA,** and/or third party collaborators.
- ✦ Send or notify, through any physical and/or digital means of communication, commercial, advertising or promotional information about



commercial services, events and/or promotions, in order to promote, invite, direct, execute, inform and in general, carry out campaigns, promotions or contests of a commercial or advertising nature, advanced by **PLAYA PIKUA**, and / or its delegates.

- ✚ To make commercial references **that PLAYA PIKUA** considers relevant for the support, expansion and / or growth of society.

V. RIGHTS OF THE OWNERS

The holders of the information collected by **PLAYA PIKUA**, by themselves or through its representatives, representatives and/or successors, in compliance with the provisions of the regulations referred to above, may exercise the following rights:

- ✚ **Right of knowledge:** By virtue of which you may access the personal data under the power of **PLAYA PIKUA**, for the purpose of consulting them, whenever they deem it relevant, or whenever there are substantial changes to the Information Processing Policies that motivate further consultations.
- ✚ **Right of update:** The owner of the information has the right to update his/her personal data when it is partial, fractional or incomplete.
- ✚ **Right of rectification:** The owner of the information has the right to rectify his personal data when those are inaccurate or induced to error.
- ✚ **Right of deletion or revocation:** The owner of the information may revoke the authorization and/or request the deletion of the data when the processing does not respect the constitutional and legal principles, rights and guarantees. Revocation shall not proceed where the holder has a legal or contractual duty to remain in the database.
- ✚ **Right to request proof of authorization:** except in events where, according to current legal rules, authorization to carry out the processing is not required.
- ✚ **Right to be informed** about the use of personal data.
- ✚ **Right to file complaints with the Superintendency of Industry and Commerce:** for violations of the provisions of the current regulations on the processing of personal data.

VI. SPECIAL DATA PROCESSING

For the processing of sensitive data or data whose owner is a minor, **PLAYA PIKUA**, states that security measures necessary for its protection were developed and states the following:

- ✚ **Sensitive data:** **PLAYA PIKUA** discloses to the holder of sensitive data, who has the right not to provide requested sensitive information,



linked, among others, to data relating to sex, religious life, political convictions, social or human rights organizations, membership of trade unions, racial or ethnic origins, biometric data or health data, among others whose misuse may lead to their discrimination of the owner of the information.

Data of minors: The provision of personal data whose owner is a minor is optional, and must be done with the authorization of the parents or legal representatives of the minor. **PLAYA PIKUA** will only use, store and process personal data of minors who are children, descendants or who depend or are in charge of employees or contractors, as well as those listed as partners of **PLAYA PIKUA** or have rights emanating from affiliation with any of them, provided that they are of a public nature. The purpose of such processing will be only to plan and carry out activities related to the personal and family well-being of partners, employees and minors, that of affiliations as dependent on the social security system and the conduct of subpoenas for shareholder meetings if this is the case. For this purpose, **PLAYA PIKUA** will take into account the respect and prevalence of the rights of minors, their best interests and their fundamental rights.

VI PROCEDURE TO EXERCISE RIGHTS.

For the exercise of the rights granted by law, the holder must do the following:

1. Communicate with **PLAYA PIKUA**, through the following channels of care:

- ✓ Phone: +57 (310) 636-95-37
- ✓ Email: info@playapikua.com
- ✓ Website: <https://www.playapikua.com/>

2. Inform verbally or in writing, by the owner of the information, its representatives, representatives and / or duly certified successors, the right that you wish to exercise, whether correction, updating or deletion.

Paragraph : In all cases the following information must be indicated: Name and identification of the Holder, the documents and other evidence intended to be asserted if any, the physical or electronic address to send the answer and inform about the status of the procedure and a precise and complete description of the facts that give rise to the procedure.

VII TERMS FOR THE ATTENTION OF THE EXERCISE OF RIGHTS

Inquiries and updates: They will be resolved within a maximum of ten (10) business days from the day following the date of receipt. Where it is not possible to respond to the consultation within said term, the interested party will be informed with two (2) working days prior to the expiration, expressing the reasons for the delay and indicating the date on which his request will be met, which in no case may exceed five (5) working days following the expiration of the first period.

Claims: If it is clear that the information contained in a **PLAYA PIKUA** database must be rectified, corrected, updated, suppressed or the alleged breach of any of the legal duties is observed, you may make claims through any of the



communication channels illustrated above. Once received the respective claim **PLAYA PIKUA** will have the term fifteen (15) working days to resolve it, counted from the day after the date of receipt.

Where it is not possible to respond to the consultation within said term, the interested party will be informed with two (2) working days prior to the expiration, expressing the reasons for the delay and indicating the date on which his request will be met, which in no case may exceed eight (8) working days following the expiration of the first period.

In the event that **PLAYA PIKUA**, is not competent to resolve the claim submitted, it will transfer to the corresponding person within a maximum period of two (2) working days and inform the interested party of the situation.

If the claim is incomplete, **PLAYA PIKUA** will require the interested party within five (5) days of receipt to complete the failures. Two (2) months after the date of the request, without the petitioner presenting the requested information, it shall be understood that he has given up the claim.

Once the claim is received, **PLAYA PIKUA** will include in the respective database a legend that says "claim pending" and the reason for it, in a term no more than two (2) business days. Such legend will be maintained until the claim is decided.

X INFORMATION SECURITY.

PLAYA PIKUA has technical, human and administrative security infrastructure and mechanisms to safeguard the information of the holders, and prevent unauthorized access to their data or any unauthorized modification, disclosure or destruction thereof.

Access to personal data is restricted to employees, contractors, representatives and **agents of PLAYA PIKUA** responsible for the processing of personal data and/or who need to know them in order to carry out their functions and develop the social object of the company.

X TRANSFER OF DATA.

When for contractual reasons the suppliers, service providers or third party collaborators **of PLAYA PIKUA** request the transfer of the information contained in databases managed by the company, you must express in writing, clearly and unequivocally, the need that motivates such request, confirm that for the use of the information contained in that database(s) will be eligible for the policy for the processing of personal data implemented **by PLAYA PIKUA and** will make known the security measures used once the requested database is delivered.

XI RESPONSIBLE AREA

From the entry into force of these policies, the General Management and administrative



management of PLAYA PIKUA will be responsible for guaranteeing the right of access of the holders of the information.

XI VALIDITY OF THE DATABASE.

The personal data incorporated in the **BEACH PIKUA Database** will be in force for the period necessary to fulfill its purposes and to allow the fulfillment of its legal and contractual obligations. Once these deadlines have expired and in accordance with the provisions of regulations regarding data archive, the physical and/or magnetic files containing the personal information, as well as the personal data contained in the databases, will be deleted.

XII PUBLICITY AND VALIDITY OF THE POLICY.

This personal data processing policy shall be made public and is entenderá vigente desde el día primero (1) de January de 2018.

Martha Lucia Martinez P
Legal Representative
PLAYA PIKUA S.A.S.