



## PRIVACY NOTICE

BANCO DE OCCIDENTE, a credit institution legally constituted and supervised by the Superintendencia Financiera de Colombia, with NIT 890.300.279-4 and main domicile at Carrera 4a. 7-61, in the city of Cali - Valle de Cauca, in compliance with the provisions of Law 1581 of 2012 and concordant regulations relating to the protection of personal data, makes available to you this Notice. 7-61, in the city of Cali - Valle del Cauca, in compliance with the provisions of Law 1581 of 2012 and the concordant regulations relating to the protection of personal data, makes available the present Privacy Notice, which informs the owners of personal data, about the existence of the Information Processing Policies that have been adopted by the BANCO DE OCCIDENTE.

### Processing of Personal Data

According to Article 15 of the Political Constitution of Colombia, all persons have the right to know, update and rectify the information held about them. BANCO DE OCCIDENTE and the AUTHORISED ENTITIES (affiliates, subsidiaries, associated or linked to its parent or controlling company; affiliates, subsidiaries, associated or linked to its parent company and their successors, assignees or whoever represents or holds their rights), use the Personal Data developed under Law 1581 of 2012 in the following manner and for the following purposes:

#### Clients and Users:

BANCO DE OCCIDENTE and the AUTHORISED ENTITIES (affiliates, subsidiaries, associates or related to its parent or controlling company; affiliates, subsidiaries, associates or related companies of its parent company and their successors, assignees or whoever represents or holds their rights, or any company in which these have direct or indirect shareholding), use the Personal Data developed under Law 1581 of 2012 for the following purposes:

#### Clients and Users:

a. Promote, market or offer, individually or jointly, products and/or services own or offered in commercial alliance, through any means or channel, or to complement, optimise or deepen the portfolio of products and/or services currently offered.



b. As an element of analysis in pre-contractual, contractual and post-contractual stages for to establish and/or maintain any contractual relationship, including as part of this, the following purposes: i. To update databases and process the opening and/or connection of products and/or services in BANCO DE OCCIDENTE or any of THE AUTHORISED ENTITIES, ii. Update databases and process the opening and/or linking of products and/or services in BANCO DE OCCIDENTE or in any of THE AUTHORISED ENTITIES , ii. Evaluate risks derived from the potential contractual relationship, in force or concluded, iii. Perform, validate, authorise or verify transactions including, when required, the consultation and reproduction of sensitive data such as fingerprint, image or voice, iv. Obtain knowledge of the holder's commercial or transactional profile, the creation, modification, conclusion and/or extinction of direct, contingent or indirect obligations, the non-fulfilment of obligations acquired with BANCO DE OCCIDENTE or with any third party, as well as any new developments in relation to such obligations, payment habits and credit behaviour with BANCO DE OCCIDENTE and/or third parties. v. To know the status of current active or passive operations or of any nature or those that in the future may be entered into with BANCO DE CCIDENTE, with other financial or commercial entities, with any operator of information or database administrator or any other similar entity that in the future may be established and whose purpose is any of the above activities, vi. To know information about my management of current accounts, savings, deposits, credit cards, commercial behaviour, employment and other products or services and, in general, about the fulfilment and management of my credits and obligations, whatever their nature. This authorisation includes information regarding the management, status, fulfilment of relations, contracts and services, payment habits, including contributions to the social security system, obligations and the current debts, overdue debts, processes, or the improper use of financial services. vii. Prevent money laundering, terrorist financing, as well as detect fraud and other illegal activities , viii. Comply with its legal and contractual obligations, ix. Exercise its rights, including those relating to judicial and extrajudicial collection activities and the related steps to obtain payment of the obligations owed by the holder or his employer, if applicable, x. Implementation of software and technological services, For the purposes of provided in this paragraph b, BANCO DE OCCIDENTE, as applicable, may carry out the Processing of my Personal Data before consulting entities, which handle or administer databases for the legally defined purposes, domiciled in Colombia or abroad, whether they are natural or legal persons, Colombian or foreign.

c. Cross-sell products and/or services offered by BANCO DE OCCIDENTE or by any of the AUTHORIZED ENTITIES or their commercial allies, including the celebration of co-branding agreements.

d. Elaborate and report statistical information, satisfaction surveys, studies and analysis of market, including the possibility of contacting me for such purposes,

e. Send messages, notifications or alerts through any means to send statements, disclose legal information, security, promotions, commercial, advertising, marketing, institutional or financial education campaigns, sweepstakes, events or events or financial education, events or events or financial education. Send messages, notifications or alerts by any means to send statements, disseminate legal information, security information, promotions, commercial, advertising, marketing, institutional or financial education campaigns, raffles, events or other benefits and inform the holder about innovations in its products and/or services, inform about improvements or changes in its customer service channels, as well as inform about other services and/or products offered by BANCO DE OCCIDENTE; THE AUTHORISED ENTITIES or their commercial allies,

f. Carry out the relevant actions, including the collection and delivery of information before public or private, national or foreign authorities with jurisdiction over BANCO DE OCCIDENTE , THE AUTHORISED ENTITIES or their activities, products and/or services, when required to comply with their legal or regulatory duties, including within these, those relating to the prevention of tax evasion, money laundering and financing of terrorism or other similar purposes issued by competent authorities,

g. validate information with the different databases of BANCO DE OCCIDENTE, of THE AUTHORISED ENTITIES, of authorities and/or state entities and of third parties such as information operators and other entities that form part of the Integral Social Security system , companies providing public services and mobile telephony, among others, to develop the activities of its main and related corporate purpose, and/or comply with legal obligations,

h. For my Personal Data to be used as evidence. The Personal Data provided may be circulated and transferred to all areas of BANCO DE OCCIDENTE including service providers, network users, distribution networks and persons promoting its products and services, including callcenters, domiciled in Colombia or abroad, whether natural or legal persons, Colombian or foreign to its commercial force, telemarketing teams and/or data processors that work on behalf of BANCO DE OCCIDENTE, including but not limited to contractors, delegates, outsourcing, outsourcing, office network or allies, with the purpose of developing system hosting services, maintenance services, analysis services, messaging services by e-mail or physical mail, delivery services, payment transaction management, collection, among others. Consequently, the holder understands and accepts that by means of this authorisation he/she grants

these third parties authorisation to access his/her Personal Data to the extent required for the provision of the services for which they were contracted and subject to compliance with the duties corresponding to them as persons in charge of the Processing of my Personal Data. Likewise, I authorise BANCO DE OCCIDENTE to share my Personal Data with the trade associations to which the entity belongs, for commercial, statistical and marketing study and analysis purposes. It is understood that the aforementioned natural and legal, national and foreign persons to whom BANCO DE OCCIDENTE may carry out the Processing of my Personal Data, also have my authorisation to allow such Processing. Additionally, by granting the present authorisation, I declare: (i) that the Personal Data provided are truthful, verifiable and complete, (ii) that I know and understand that the provision of the present authorisation is voluntary, for which reason I am not obliged to grant the present authorisation. (iii) that I know and understand that by simply submitting a written communication I may limit in whole or in part the scope of this authorisation so that, among others, the authorisation is granted only to BANCO DE OCCIDENTE but not to the AUTHORISED ENTITIES and (iv) have been informed about my rights to know, update and rectify my Personal Data, the optional nature of my answers to the questions asked when they deal with sensitive data or data of children or adolescents, to request proof of the authorisation granted for their processing, to be informed about their use, to file complaints before the competent authority for infringement of the law, once I have exhausted the processing procedure, to be informed about their use, to file complaints before the competent authority for infringement of the law, children or adolescents, to request proof of the authorisation granted for their processing, to be informed about the use that has been made of them, to file complaints before the competent authority for infringement of the law once I have exhausted the consultation or complaint procedure before BANCO DE OCCIDENTE, to revoke this authorisation, to request the deletion of their data in the cases in which it is appropriate and to exercise my constitutional and legal rights and guarantees free of charge at.

**Suppliers:** (i) comply with legal standards of knowledge of the supplier; (ii) establish, maintain and deepen the contractual relationship; (iii) update information; (iv) assess risk; (v) deepen products and services; (vi) determine the level of indebtedness on a consolidated basis; (vii) carry out marketing work, commercial or statistical research; (viii) for security reasons; (ix) to prevent money laundering, financing of terrorism and (x) to comply with legal and/or contractual regulations, and while having outstanding obligations, direct or indirect liabilities, for the additional time required by special regulations or by the statute of limitations.

**Candidates and Employees:** Candidate information, including information contained in the curriculum vitae, is used for the purpose of evaluating candidates for employment with the Bank. The purpose of the databases of employees is to develop the working relationships that exist with them and to make them participants in the activities planned by the Bank.

For further details, please consult the **Information Processing Policies** on the website <https://www.bancodeoccidente.com.co>

## Rights of Data Holders

BANCO DE OCCIDENTE will recognise in favour of the holder the following rights in the legal terms established by Law 1581 of 2012 and its regulatory decrees:

- To know, update and rectify their personal data. This right may be exercised, among others against to partial, inaccurate, incomplete, fractioned, misleading data, or those whose treatment is expressly prohibited or has not been authorised.
- Request proof of the authorisation granted, except when expressly exempted as a requirement for processing, in accordance with the provisions of law 1581 of 2012.
- Be informed, upon request, regarding the use that has been made of their personal data.
- Access free of charge to their personal data that have been subject to processing.
- File complaints with the Superintendence of Industry and Commerce for violations of the provisions of law 1581 of 2012 and other rules that modify, add or supplement it.
- To revoke the authorisation and/or request the deletion of the data when the processing does not respect the constitutional and legal principles, rights and guarantees .

**Note:** The request for deletion or revocation will not proceed when the holder has a legal or contractual duty to remain in the database.

## Mechanisms for exercising the Consultation and Complaint Rights

BANCO DE OCCIDENTE offers its holders the following channels for exercising their rights, in accordance with the provisions of the regulations:

- National Office Network and Credicentros, which can be consulted on the website <https://www.bancodeoccidente.com.co>
- Customer Service Lines: Nationally on 01 8000 514 652 and in Bogotá on 307 70 27.

- E-mail: [datospersonales@bancodeoccidente.com.co](mailto:datospersonales@bancodeoccidente.com.co)

**Requirements:** In order to attend to the request, the holder must prove his identity; in the event that the query or claim is not submitted by the holder, a document must be attached that proves the capacity of representative, successor, or attorney-in-fact of the same. The request must indicate physical or electronic address where you wish to receive the reply. In the case of claims, a description of the facts that give rise to the claim and the documents that you wish to attach to support it (optional) must be sent to.

If any of the requirements are missing, you will be informed within five (5) days of receipt of your request. It will be understood that the claim has been withdrawn if after two (2) months from the date of the request, the required information has not been submitted.

**Deadline:** A response to queries will be given no later than ten (10) working days from the date of receipt, which may be extended by five (5) more working days. In the case of complaints, will respond within fifteen (15) working days at the latest, which may be extended for a further eight (8) working days, in accordance with the provisions of the Law.

### **Changes in the Policies or in the Privacy Notice**

BANCO DE OCCIDENTE will inform of any substantial change in the Personal Data Processing Policies or in the Privacy Notice, by means of its web page or any other means that considers relevant.