

INFORMATION PROCESSING POLICIES

INSIGHT CRIME DATABASES

Preliminary Provisions

INSIGHT CRIME (hereinafter “INSIGHT CRIME”), being aware of the importance of personal data for the owners of said data and the responsibility INSIGHT CRIME has acquired for it as a result of information processing activities conducted in executing its corporate purpose, hereby makes available to the interested parties its personal information processing policies in accordance with the provisions of article 2.2.2.25.3.1 of the Decreto Único of the Comercio Industria y Turismo sector, DU 1074 de 2015 (Decreto 1377 de 2013, Art. 13).

1. Our Contact Information

INSIGHT CRIME, the *PARTY RESPONSIBLE* for the *PROCESSING* of personal information composing its *DATABASES*, is located in the city of Medellín, Colombia with its headquarters at Calle 15 Sur No. 32 B - 56. Its telephone number is +57 (4) 580-2999, and its email address is info@insightcrime.org.

2. Our Policy Objective

The purpose of this document is to regulate the activities related to the processing to which the personal data contained in *INSIGHT CRIME'S DATABASES* will be subjected, mainly in relation to the purpose of the same, the rights of the personal data *OWNERS*, the commitments made by *INSIGHT CRIME* with the data *OWNERS* in its capacity as the *PARTY RESPONSIBLE* for the processing and tools adopted, so that the *OWNERS* can adequately exercise their rights.

3. Processing Activities

The *INSIGHT CRIME DATABASES* refer to the set of personal data systematically stored in accordance with the purposes described in section 4 of this policy. The processing activities carried out on said *DATABASES* include the collection of personal data and its storage, transmission to supervisors, use for the normal completion of activities included in *INSIGHT CRIME'S* corporate purpose and compliance with legal and contractual requirements, and consultation and verification of information. *INSIGHT CRIME* does not transfer its *DATABASES* to third parties; however, if it is required to do so, *INSIGHT CRIME* will ensure that it has express and informed prior authorization for the completion of said processing activity.

The aforementioned processing activities may be executed through emails; physical documents; text messages; data messages; telephone calls (cellular and landline); and inclusion of information in electronic, digital or physical media, among others.

4. Processing Purposes

INSIGHT CRIME, in order to accomplish its corporate purpose and comply with different legal and contractual requirements, internal and external, requires certain *DATABASES* whose purposes vary depending on the characteristics and nature of the data being processed, as described below:

A. Common Purposes For All Databases

The following purposes pursued by *INSIGHT CRIME* with the processing of personal information are common in all its *DATABASES*:

- 4.1 Establishment of communication channels with the owners of the personal data, and sending bulletins and information of a commercial and institutional nature
- 4.2 Compliance with legal and/or contractual obligations related to the development of activities specific to *INSIGHT CRIME'S* corporate purpose
- 4.3 Organization and execution of cultural and institutional events and programs
- 4.4 Attention to and processing of requirements, complaints and claims
- 4.5 Information storage in active and/or inactive files when there is a legal obligation to maintain information after the execution of the activities or relationships that bring about the processing in accordance with the provisions of the specific laws that regulate the matter

B. Purposes Specific To Certain Databases

4.6 Payroll Database

The processing activities for the *PAYROLL DATABASE* (current and former employees), in addition to the purposes common in all the aforementioned *DATABASES*, will have the following purposes:

- 4.6.1 Execution of selection, promotion, occupational wellbeing, payroll, performance and competence, induction, training, and occupational and environmental health and safety processes
- 4.6.2 Conducting knowledge-based, psychological and/or technical tests on the personal data owners
- 4.6.3 Execution of educational and training programs
- 4.6.4 Issuance and validation of work and/or commercial references
- 4.6.5 Provision of personal information for the implementation of *INSIGHT CRIME'S* contractual relationships with third parties

- 4.6.6 Adoption of control and security measures for the different facilities, properties or assets of *INSIGHT CRIME*
- 4.6.7 Verification and consultation of information related to the personal data owners in lists and databases of a public or private nature, both national and international, directly or indirectly related to (i) judicial, criminal, fiscal and disciplinary background, and background regarding damage to state assets; (ii) inabilities or incompatibilities; (iii) money laundering; (iv) financing of terrorism; (v) corruption; (vi) transnational bribery; (vii) whether the personal data owner is sought by the courts; and in any other database providing information linking people to illicit activities of any kind.

4.7 Supplier Databases

The processing activities for the *SUPPLIER DATABASE* (including potential, current and former suppliers, as well as employees and contact people of the same), in addition to the purposes common in all the aforementioned *DATABASES*, will have the following purposes:

- 4.7.1 To facilitate the process for service contracting and/or product supply
- 4.7.2 To verify the contractors' compliance with the contractual benefits favoring the contractors
- 4.7.3 Evaluation of the quality of the services and products provided by the suppliers
- 4.7.4 As an element of analysis to establish and/or maintain contractual relationships
- 4.7.5 As an element of analysis for the assessment of risks derived from current contractual relationships
- 4.7.6 As an element of analysis for the verification of the origin of funds, resources and/or activities related to money laundering and/or the financing of terrorism
- 4.7.7 Validation of commercial references and other information provided
- 4.7.8 Verification and consultation of information related to the personal data owners in lists and databases of a public or private nature, both national and international, directly or indirectly related to (i) judicial, criminal, fiscal and disciplinary background, and background regarding damage to state assets; (ii) inabilities or incompatibilities; (iii) money laundering; (iv) financing of terrorism; (v) corruption; (vi) transnational bribery; (vii) whether the personal data owner is sought by the courts; and in any other database providing information linking people to illicit activities of any kind
- 4.7.9 Verification, consultation and reporting of information related to the credit, financial, commercial and service behavior of the personal data owners to the public or private entities that administer or manage databases related to the birth, development, modification and extinction of, and compliance with, financial, commercial, credit and service requirements.

4.8 Client Database

The processing activities for the *CLIENT DATABASE* (including current and former, as well as contact people of the same), in addition to the purposes common in all the aforementioned *DATABASES*, will have the following purposes:

- 4.8.1 Monitoring **CLIENTS'** compliance with requirements
- 4.8.2 As an element of analysis to establish and/or maintain contractual relationships
- 4.8.3 As an element of analysis for the assessment of risks derived from current contractual relationships
- 4.8.4 Transmission of the personal data of the *OWNERS* of the same to the natural or legal persons holding the status of strategic allies of *INSIGHT CRIME*, or with which *INSIGHT CRIME* has entered into collaboration or partnership agreements
- 4.8.5 Collection, storage, consultation, circulation, transmission, verification, use, reproduction, disclosure, communication, adaptation, extraction, compilation, dissemination and deletion of the images of the *OWNERS* of the information in order to create identification cards for inside *INSIGHT CRIME*, as well as illustrate articles or institutional publications, marketing and/or advertising related to *INSIGHT CRIME'S* corporate purpose to be published in magazines, websites and social networks of *INSIGHT CRIME*

4.9 Reader/Subscriber Database

The processing activities for *EXTERNAL INTEREST GROUP DATABASES* will have the purposes common in all the *DATABASES* addressed in sections 4.1 to 4.5.

4.10 Partner Database

The processing activities for the *PARTNER DATABASE*, in addition to the purposes common in all the aforementioned *DATABASES*, will have the following purposes:

- 4.10.1 Compliance with legal requirements and requirements derived from the articles of association against the partner, owner of the data
- 4.10.2 Provision of information related to the decisions of *INSIGHT CRIME*

5. Owner Rights

INSIGHT CRIME is committed to respecting the interests of the owners of personal data subjected to its processing and, aware of the importance of the proper processing of personal data, recognizes the following rights of the owners of the data in *INSIGHT CRIME DATABASES*:

5.1 Knowledge

By virtue of this right, the owner of the data is entitled to request, at any time and free of charge, information about the data being manipulated by *INSIGHT CRIME* and the use being given to said data.

5.2 Correction

Recognizes the power of the owner of the data to request, at any time, the correction of inaccurate information housed in *INSIGHT CRIME DATABASES*

5.3 Updating

Right of the owner of the data to request that, for reasons other than data correction, the information housed in *INSIGHT CRIME DATABASES* be complete and updated. In the same vein, the owner may request the entry or removal of all types of information considered relevant.

5.4 Request a copy of the authorization

When, in accordance with the provisions of article 10 of Act 1581 of 2012, authorization must be obtained from the owner in order to subject the owner's data to processing activities, the owner shall be able to request, at any time and free of charge, a copy of the authorization so issued.

5.5 Revocation of authorization

When, in accordance with the provisions of article 10 of Act 1581 of 2012, authorization must be obtained from the owner in order to subject the owner's data to processing activities, the owner shall be entitled to revoke the authorization issued, provided there is no legal or contractual duty for it to remain in the database in question.

5.6 Deletion

By virtue of this right, the owner may request that *INSIGHT CRIME*, at any time, delete the data housed in *INSIGHT CRIME DATABASES*, provided there is no legal or contractual duty for it to remain in the database in question.

Procedures For The Effective Exercise Of Rights

6. General Provisions

INSIGHT CRIME has adopted a series of procedures to appropriately process personal information and for the owners recognized in section 5 to exercise their rights. These

procedures will vary depending on the right exercised by the owner, as is noted in sections 7 and 8 below.

7. Inquiries

For the exercise of the rights to knowledge, access to the information and the request of a copy of the authorization as put forth in section 5, paragraphs 5.1 and 5.4, respectively, the owners or authorized persons, in accordance with the provisions of section 9, shall be able to make inquiries to the competent area, section 10, according to the following rules:

7.1 Mechanisms

Inquiry requests shall be submitted to the *INSIGHT CRIME* Privacy Officer by either of the following means: email at info@insightcrime.org or telephone at +57 (4) 580-2999.

Inquiry requests shall be submitted by the people who, according to section 9, are entitled to do so, by briefly describing the information to which they wish to have access and providing their mailing address, identification information and, when the person submitting the request is not the owner, documents proving their entitlement to act.

7.2 Procedure

Once the inquiry request has been received, the competent area will resolve it to the largest extent possible within ten (10) business days following the date of receipt of the inquiry request.

When it is not possible to carry out the inquiry within the term indicated in the previous paragraph, the applicant shall be informed of the situation, the reasons for the delay and the date on which the inquiry will be resolved, a date that shall not, in any case, exceed five (5) business days following the expiration of the first term.

7.3 Response

The competent area for procedures related to the proper processing of personal data shall respond to the demands of the owners of the data within the terms established in the previous section. The response shall be in writing to the physical or electronic address provided by the applicant for this purpose.

When the applicant provides a physical address and an electronic address, or more than one of either type of address, *INSIGHT CRIME* shall have the discretion to decide to which address it will send the response to the inquiry request.

8. Complaints

To exercise the rights to correction, updating, authorization revocation and information deletion put forth in sections 5.2., 5.3., 5.5. and 5.6., respectively, the owners or authorized

persons, in accordance with the provisions of section 9, shall be able to present complaints to the competent area, section 10, according to the following rules:

8.1 Mechanisms

Complaints shall be submitted to the *INSIGHT CRIME* Privacy Officer by either of the following means: email at info@insightcrime.org or telephone at +57 (4) 580-2999.

Complaints shall be submitted by the people who, according to section 9, are entitled to do so, by briefly describing the events that motivated the complaint and providing their mailing address, identification information, documents supporting the complaint and, when the person submitting the request is not the owner, documents proving their entitlement to act.

8.2 Procedure

Incomplete complaint

When *INSIGHT CRIME* believes that the claim submitted by the owner or by the person authorized to do so, in accordance with the provisions of section 9, is incomplete because the requirements established in the previous section have not been met, it shall require, within five (5) days after receiving the complaint, that the interested party correct the errors.

If the interested party does not submit the information requested by *INSIGHT CRIME* within two (2) months from the date of *INSIGHT CRIME'S* request, the complaint will be considered withdrawn without limitations on the ability to submit a new complaint for the same issue, in which case the terms for resolving it will begin to be counted from the date of the new complaint.

Complete complaint

Once the complete complaint has been received or the issues addressed in the complaint have been corrected within the term established in the previous paragraph, a caption shall be added to the respective *INSIGHT CRIME DATABASE* saying, "complaint in progress," and the reason thereof within a term no greater than two (2) business days. This caption will remain until the complaint is resolved.

Notwithstanding the aforementioned, the competent area will resolve the complaint to the largest extent possible within fifteen (15) business days following the date of receipt of the same.

When it is not possible to resolve the complaint within the term indicated in the previous paragraph, the owner shall be informed of the situation, the reasons for the delay and the date on which the complaint will be resolved, a date that shall not, in any case, exceed eight (8) business days following the expiration of the first term.

8.3 Decision

The *INSIGHT CRIME* Privacy Officer shall respond to the demands of the owners of the data within the terms established in the previous section. The response shall be in writing to the physical or electronic address provided by the applicant for this purpose.

When the applicant provides a physical address and an electronic address, or more than one of either type of address, *INSIGHT CRIME* shall have the discretion to decide to which address it will send the response to the inquiry request.

9. Authorization

Those authorized to exercise the rights established in section 5 and others recognized by law shall be the owner of the data, the owner's successor(s) and those otherwise authorized by the owner. In the last two cases, the authorization must be proven by means of suitable mechanisms.

10. Competence

For all matters related to personal information processing activities and resolving inquiries and complaints, *INSIGHT CRIME* has designated the Privacy Officer as competent, taking, to that end, technical, human and administrative measures that guarantee the confidentiality and security of the information.

Final Provisions

11. Validity

This policy applies as of the date of its publication, on January 16, 2018, and will be valid during the time that *INSIGHT CRIME* carries out the activities described in section 3 and during the time the same correspond to the purposes of processing that inspired this policy.

Substantial changes to the processing policies that may affect the content of the authorization, mainly those related to the identification of *INSIGHT CRIME* and/or the purpose for the processing of personal data, shall be communicated efficiently and in a timely manner to the *OWNERS* before implementation of the new policies.