# PRIVACY POLICY, INFORMATION HANDLING AND PERSONAL DATA PROTECTION OF FEEL MEDELLÍN

Please read carefully the content of the following texts. By using this site, you accept the privacy policy, information handling and personal data protection described here.

#### PRIVACY POLICY

According to the personal data protection law 1581 of 2012 of Habeas Data, it is important for you to know the following:

By accepting the legal terms and conditions, you indicate that you know and you authorize previously, expressly and informed Feel Medellín, to record and use your personal data with the final purpose of having an efficient communication during the present process or activity and you authorize in the same term, that that information could be handled according to the law 1581 of 2012 and its regulatory decrees, with the final purpose of receiving information about its products, services, offer, promotions, partnerships, studies, competitions and contents. In the same way, you have been informed about the personal data protection policy in this site, in which it's included the queries and reclamation procedures that allow to make effective your rights to access, knowledge, consult, rectification, actualization and suppression of data, equally you can present any query about your personal data through the e-mail address: info@feelmedellin.com

This website cares about the personal data protection. This is the reason why, when you visit FEELMEDELLIN.COM, we guarantee to keep control over your personal data on our website. Next, we describe the guidelines that we use to protect the information that you as a user will provide us during your visit to our website.

#### PERSONAL DATA

In some parts of our portal, we ask you to provide us information that allow us to improve your visit to our website, answer the purchase offer, or keep track to your concerns after your visit. PARTICIPATION IS TOTALLY OPTIONAL. It's possible that we ask for your first name and surname, ID number, e-mail address, phone number, country and/or city of residence, information about your preferences as well as other similar personal data to the one needed to book or subscribe to services or offers. If anytime we need information considerably different, we will let you know. When the user provides personal data to Feel Medellín, we won't give it away or sell it to any external company for their use with marketing purposes or services offer. We will keep personal data confidentiality and only Feel Medellin will use it to strengthen your relationship with us. In case of newsletters or mailing lists, or any promotional or publicity activity, our intention is to send e-mails only to our clients who we believe have chosen to receive those messages. In any moment, the user has the right to opt not to receive communication from Feel Medellín in the future, canceling their subscription to these services, through our website or our customer service line.

# **Cookies policies**

To understand better the needs of our users and deliver a better service this site uses cookies to collect anonymous information about preferences and interests of its users. A cookie is any text string that asks for authorization to be stored on the computer's hard drive. If the user accepts, then the browser adds the text in a small file with the purpose of notifying us when the user visits our site. The information collected this way is provided to associated companies and is used by them to create anonymous profiles for any purpose, including, but not limited to, develop, manufacture and market products; and it can be used, commercialized or disseminated by FEEL MEDELLÍN. The information provided to such companies does not include and is never combined with personal data to identify a specific person (such as name, address or email address) or any information that may be considered sensitive or that may compromise privacy of the users.

#### You can choose

Stop receiving commercial messages via e-mail, direct mail, phone and mobile phone. Update and to correct your personal data.

Feel Medellín follow these privacy principles on line and off line when collecting, using and sharing the client's data.

## Use impediment

Feel Medellín will examine the request presented by the User and will reserve the right to verify the data communicated by the User. In case that the user submits false information at the time of registration or fails to notify any change, Feel Medellín may proceed with the immediate termination of the booking of the User in question, but not before obtaining the payment of any amount of money left to pay.

## User responsibility

When entering this portal, the user compromises to give the correct and true personal data, and also to update their data whenever is required.

It is forbidden for the user to posting on, or transmitting to or from this portal any illegal, threatening, false, defamatory, obscene, scandalous, pornographic or profane material, or any other material that could cause any civil or criminal responsibility in terms of the law.

You agree not to use any device, software, routine or data to obstruct or attempt to obstruct the proper functioning of the Feel Medellín portal or any activity carried out on this portal. Furthermore, you agree not to use, or attempt to use, any engine, software, tool, agent, data or other device or mechanism (including, among others, scanners, spiders, robots, digital characters or intelligent agents) to browse or search in the Feel

Medellín portal that is not the search engine or the search agents provided by Feel Medellín or the explorers in general available to the public.

## Data collected by Feel Medellín

As part of your interaction with Feel Medellín, personal data may be collected, such as: Contact information, including name, surname, identification number, telephone number and e-mail address.

We may also collect demographic information, including age, personal interests and product preferences.

We can get to ask your personal data when you are buying or using the services we offer. For example, we may ask for and / or collect personal data when you:

- Buy our services.
- Contact us for queries or concerns.
- Participate in other activities with Feel Medellín.

#### Personal data uses

- Fill requests of services or information.
- Deliver information.
- Provide customer service.
- Manage competitions, promotions or surveys.
- Offer new products and services.
- Improve the effectiveness of our web portal, of our marketing efforts and our services and offers.
- Conduct research and analysis.
- Send marketing communications.
- Carry out other business activities when necessary or as described in other parts within this policy.

If you provide us information about other people, or if other people give us information about you, we will only use that information for the specific reason for which it was provided.

#### Share personal data

Feel Medellín does not sell or rent personal data to third parties.

We may need to share your personal data with third parties such as our agents, service providers and other representatives acting on our behalf, for limited purposes.

From time to time, we may be required to share personal data in response to a valid court order, a government investigation or in other ways required by law. We also reserve the right to inform law enforcement agencies of activities that we believe to be, in good faith, illegal.

We will share certain personal data when we believe that such disclosure is reasonably necessary to protect the rights, property and safety of others and ourselves. We may also transfer personal data in the event of a corporate sale, merger, acquisition, dissolution or similar event.

Any information that personally identifies you and that appears on a bulletin board, blog, chat, comment on a product in this portal, can be read, compiled or used by other users and could be used to send you unsolicited messages. We recommend that you do not give your personal data. Please note that if you choose to do so, it is at your own risk and you accept full responsibility for such comments and the consequences that may come from publishing such information.

## Information for payments

Within the alternative contemplated in this portal for the cancellation of the services selected by the user, Feelmedellin.com offers, a link that leads to the PayU platform, where there is a variety of payment methods, some are communicated with the web portals of the respective financial entities, in which the payment is made, and therefore, in such events the handling of the personal data will be the exclusive responsibility of the financial institution, as established in its agreements with the users. In the cases where there is no such link, but the information is provided directly to PayU through this portal, the responsibility for the handling of personal data will be in the terms established in this document and those provided by PayU on its platform.

### Disclaimer

Whenever the user has not notified promptly the existence of a violation of their personal information, or when the user has not proceeded to notify the corresponding financial entities or cooperatives of the loss, misuse, or theft of the instruments conferred by these to carry out transactions, or when there is an improper use of their registration data, Feel Medellín does not assume any responsibility for such actions.

#### Choices about your personal data

Feel Medellín communicates with its clients through multiple channels and means to keep them updated on topics such as promotions, offers, content of the customer experience and new products or services.

Once you provide your personal data, we can contact you by email or phone. We can continue to communicate through these channels unless you request to stop receiving

these communications opting to be excluded. Before sending you mobile advertising (for example text messages), we will ask for your express consent requesting your participation.

If you no longer wish to receive these communications, you can let us know by calling (57) 300 8381253 or through the Chat or email to make the request.

Feel Medellín will take the necessary measures to modify your presence on its advertising communications. Due to the production timelines, emails and systems, it may take some time to process your request. The following guidelines are offered for your convenience:

Guidelines are offered for your convenience:

- 20 business days for emails.
- Until the requested change comes into effect, you may continue receiving advertising communications from us.

Even if you have chosen to be excluded from advertising communications, you may still receive commercial communications such as communications related to the organization.

## Feel Medellín WhatsApp chat privacy policy

Feel Medellín informs that the personal data that could be provided by the user in your username and in the content of the conversations, will be treated solely and exclusively for the management and correct functioning of the chat, through a third party in charge of the development of the chat platform. The personal data treatment policy of Feel Medellín can be found below in this document or in www.feelmedellin.com, and for the exercise of the rights of habeas data the owner can contact the email info@feelmedellin.com

# FEEL MEDELLÍN INFORMATION HANDLING AND PERSONAL DATA POLICY

## Generalities

This policy is defined in accordance with the entry into force of the Statutory Law 1581 of 2012 which aims to dictate the general parameters for the protection of personal data and develop the constitutional right that all people have to know, update and rectify the information that has been collected about them in databases or files as well as the right to information; therefore, FEEL MEDELLÍN, taking into account its condition as responsible for the processing of personal data that assists it, is allowed to formulate the present text in order to give effective compliance to such regulations and especially for the attention of inquiries and complaints about of the treatment of the personal data that FEEL MEDELLÍN collects and manages.

The right to HABEAS DATA is the one that every person has to know, update and rectify the information that has been collected about them in archives and data banks of a public or private nature and guarantees all citizens the power of decision and control over their personal information. Therefore, FEEL MEDELLÍN, welcomes such parameters taking into account that for the development of its corporate purpose, is continuously compiling and carrying out various treatments to databases of customers, partners, suppliers, business allies and employees. According to the above, within the legal and corporate duty of FEEL MEDELLÍN of protecting the right to privacy of persons, as well as the power to know, update or request the information that is stored in databases, FEEL MEDELLÍN has designed the present policy of handling personal data and databases in which it describes and explains the treatment of Personal data to which you have access through our website, email, text messages, message voice, phone calls, face to face, physical or electronic means, current or developed in the future as other communications sent as well as through third parties who participate in our commercial or legal relationship with all our customers, employees, suppliers, partners, strategic allies and linked. This Policy will be adjusted to the extent that the regulations applicable to the matter are regulated and new orders come into force.

General objective: With the implementation of this policy, it is intended to guarantee the reservation of information and security regarding the treatment that will be given to it to all customers, suppliers, employees and third parties from whom FEEL MEDELLÍN has legally obtained information and personal data in accordance with the guidelines established by the regulatory law of the right to Habeas Data. Likewise, through the issuance of this policy, we comply with the literal K of the article 17 of the law referred.

#### **Definitions**

- **1. Authorization:** consent that, prior, express and informed, the owner of some personal data issues for the company to carry out the processing of their personal data.
- **2. Holder:** natural person whose data is subject to treatment by the company.
- **3. Database:** set of personal data.
- **4. Personal data:** information that is linked to a person. It is any piece of information linked to one or more people determined or determinable or that can be associated with a natural or legal person. Personal data can be public, semi-private or private.
- **5. Treatment:** any operation or set of operations on personal data which may include collection, storage, use, circulation or deletion.
- **6. Supervisor of the treatment:** natural or legal person, public or private, which by itself or in association with others, performs some treatment on personal data on behalf of the controller.
- **7. Responsible for the treatment:** natural or legal person, public or private, that by itself or in association with others, decides on the database and / or the treatment of the data.
- **8. Public data:** It is that data qualified as such according to the mandates of the law or the Constitution. Are public, among others, the data contained in public documents, judicial rulings that are not subject to reservation and those related to the civil status of the persons.

- **9. Semi-private data:** It is semi-private data the one that has no private nature, reserved, or public and whose knowledge or disclosure may interest not only the owner but a certain sector or group of people or society in general, such as financial data and credit of commercial activity.
- **10. Private data:** It is the data that by its intimate or reserved nature is only relevant to the owner
- **11. Sensitive data:** those related to racial or ethnic origin, membership in trade unions, social or human rights organizations, political interests, religious beliefs, sexual life, biometric or health information. This information may not be granted by the Owner of these data.

## Rights of holders of personal data

Any process that involves the treatment by any area of the company of personal data of customers, suppliers, employees and in general any third party with which FEEL MEDELLÍN maintains commercial and labor relations must take into account and inform you expressly and prior, by any means from which a record of compliance can be kept, the rights that assist that data owner, which are listed below:

- 1. Right to know, update, rectify, consult your personal data at any time in front of FEEL MEDELLÍN regarding the data that you consider partial, inaccurate, incomplete, fractioned and those that lead to error.
- 2. Right to request at any time proof of the authorization granted to FEEL MEDELLÍN.
- 3. Right to be informed by FEEL MEDELLÍN upon request of the owner of the data, regarding the use that has been given to them.
- 4. Right to submit to the Superintendence of Industry and Commerce complaints that you consider pertinent to assert your right to Habeas Data in front of the company.
- 5. Right to revoke the authorization and / or request the deletion of any data when you consider that FEEL MEDELLÍN has not respected your constitutional rights and guarantees.
- 6. Right to access, free of charge, the personal data that you voluntarily decide to share with FEEL MEDELLÍN.

# Cases in which Feel Medellín does not require authorization for the processing of the data held by them

- 1. When the information is requested to the company by a public or administrative entity that is acting in the exercise of its legal functions or by judicial order.
- 2. When it is public data because they are not protected by the scope of application of this rule.
- 3. Events of medical or sanitary urgency duly verified.
- 4. In those events where the information is authorized by law to comply with historical, statistical and scientific purposes.
- 5. In the case of data related to the civil registry of persons because this information is not considered as a private data.

# To whom information can be given by Feel Medellín without the need for authorization from the owners of the data

To the holders of the data, their heirs or representatives at any time and through any means when they request it from FEEL MEDELLÍN.

To the judicial or administrative entities in the exercise of functions that raise some requirement to the company so that the information is delivered to them.

To third parties that are authorized by any law of the Republic of Colombia.

To third parties to whom the data holders expressly authorizes to deliver the information and whose authorization is given to FEEL MEDELLÍN.

# Duties that Feel Medellín has regarding the holders of the data

FEEL MEDELLÍN, recognizes that personal data is the property of the holders and that only such persons may decide on them. In this sense, it will make exclusive use for those purposes for which it is empowered under the terms of the law and for the sake of the this it is allowed to inform the duties assumed in its capacity as responsible for the treatment:

- 1. The company must find the means to obtain the express authorization by the owner of the data to perform any type of treatment.
- 2. The company must clearly and expressly inform its customers, employees, suppliers and third parties in general, from which it obtains databases, the treatment to which they will be subjected and the purpose of such treatment. To do this, the company must design the strategy through which for each event, mechanical or data request that is made, inform them the respective treatment in question. Some of these means may be the sending of text messages, completion of physical formats, through the websites of FEEL MEDELLÍN. among others.
- 3. The company must inform the holders of the data for each case, the optional nature of responding and grant the respective information requested.
- 4. In all cases in which data are collected, the rights that all the owners have regarding their data must be informed.
- 5. The company must provide the identification, physical or electronic address and telephone number of the person or area that will be responsible for the treatment.
- 6. The company must guarantee at all times to the owner of the information, the full and effective exercise of the right to habeas data and of petition, that is, the possibility of knowing the information on it that exists or reposes in the database, request the update or correction of data and process consultations, all of which will be done through the mechanisms of consultations or claims provided in this policy.
- 7. The company must keep the records of personal data stored with due security in order to prevent its deterioration, loss, alteration, unauthorized or fraudulent use and to periodically and timely update and rectify the data, whenever the owners of them report news or requests.

## Purposes in the capture, use and processing of personal data

FEEL MEDELLÍN, in the development of its corporate purpose and its relations with third parties, understood by these clients, employees, suppliers, creditors, strategic allies, among others; constantly collects data to carry out various purposes and uses within which they can be framed:

- The effective registration of the reservation of your services.
- Have communication with their clients during and after the provision of the service.
- Administrative, commercial, promotional, informational, marketing and sales aims.
- Offer all kinds of commercial services; as well as carry out promotion, marketing, advertising campaigns.
- Search for a closer knowledge with all our customers, suppliers, employees and related third parties.

In relation to the above, FEEL MEDELLÍN, may execute the following actions:

- 1. Obtain, store, compile, exchange, update, collect, process, reproduce and / or have the data or information, partial or total, of those holders that grant it due authorization in the terms required by law and in the formats that for each case is considered convenient.
- 2. Sort, arrange, separate the information provided by the owner of the data.
- 3. Carry out investigations, compare, verify and validate the data obtained in due form with financial credit risk centers with which there are commercial relationships.
- 4. Extend the information obtained in the terms of the habeas data law, to the companies that eventually hire the services of capture, storage and management of their databases before the due authorizations that in that sense are obtained.
- 5. Transfer the data or partial or total information to their suppliers, businesses, companies and / or affiliated entities and strategic allies.

### The authorization

In order to carry out the mentioned purposes, FEEL MEDELLÍN requires free, prior, express and duly informed authorization by the holders of the data and to that end, it has established appropriate mechanisms to capture information guaranteeing for each case that it is possible to verify the granting of said authorization. It may appear in any way, whether it is a physical document, electronic or in any format that guarantees its subsequent consultation through technical, technological tools and developments of computer security. The authorization is a declaration that informs the owner of the data the following information:

- A. Who is responsible or in charge for collecting the information
- B. Collected data
- C. Purposes of the treatment
- D. Procedure for granting the rights of access, correction, update or deletion of data
- E. Information on the collection of sensitive data

## Protection of personal data of minors and adolescents

If applicable and in accordance with the provisions of Statutory Law 1581 of 2012 and Regulatory Decree 1377 of 2013, FEEL MEDELLÍN, ensures that the Treatment of the personal data of children and adolescents will be carried out respecting their rights, which is why, in the commercial and marketing activities carried out by FEEL MEDELLÍN, must have the prior, express and informed consent of the father or mother or the legal representative of the girl, boy or adolescent.

# How to proceed regarding the consultations and requests made by the holders of the data

Every holder of personal data has the right to make inquiries and submit requests to the company regarding the handling and treatment given to your information.

- A) Procedure for processing claims or requests: Any request, queries, complaint or claim that is presented to FEEL MEDELLÍN, by any holder of the data or his successors in relation to the handling and treatment given to his information will be resolved in accordance with the law regulating the right to habeas data and will be processed under the following rules:
- 1. The petition or complaint will be formulated through the virtual channels of attention to the user such as: web page, mail, customer service line. The petition or claim must contain the identification number of the owner, the description of the facts that give rise to the claim, the address or means through which you wish to obtain your response, and if pertinent, accompanying the supporting documents that you want to enforce. If the writing is incomplete, the company will ask the interested party to correct the failures within five (5) days following receipt of the claim. After two (2) months from the date of the request, without the applicant submitting the information required, it will be understood that you have desisted from the claim or request.
- 2. The applicant will receive a response from FEEL MEDELLÍN, within fifteen (15) business days counted from the date on which we had actual knowledge of the request.
- 3. When it is not possible to attend the request within said term, the interested party will be informed, stating the reasons for the delay and stating the date on which his request will be handled, which in no case may exceed eight (8) business days following the expiration of the first term.
- B) Inquiries: The policy of handling personal data by FEEL MEDELLÍN and the basic rights that the holders of the data have in relation to it may be consulted through the following website: www.feelmedellin.com.

Any query that a holder has about their information or personal data or when it considers it necessary to establish a request for information or considers that their rights have been

violated in relation to the use and handling of their information; You can do so through the following email: info@feelmedellin.com or in the customer service phone number available at www.feelmedellin.com.

C) Responsible for and in charge of the treatment: FEEL MEDELLÍN Has the quality of responsible for the treatment, through this policy is allowed to inform your identification information:

Business Name: MARIA CAMILA JARAMILLO GOMEZ- FEEL MEDELLÍN.

NIT: 1017183929-4.

Main Address: Carrera 26 # 10-130 Medellín, Antioquia.

Person or dependency responsible for the attention of requests, consultations and Claims: The area in charge of receiving and channeling all the requests and concerns is Feel Medellín's Customer Service through the email info@feelmedellin.com.

These policies were published on the Feel Medellín website on February 23, 2018 and become effective as of the date of publication.