



PRIVACY AND PERSONAL DATA

PERSONAL DATA PRIVACY AND WEB PRIVACY POLICY

Public Version for www.vissogp.com aligned with VISSO's corporate policies and Colombian regulations applicable to personal data processing and web channels.

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|--------------------------|---|---------------------------------------|
| Version 2026.1 | Use Público | Effective Date 09-04-2026 |
| Brand VISSO | Source Internal Policies + Colombian Regulations | Format Web / Implementation |

Data Controller Identification

VISSO CONSULTORES S.A.S. - NIT 901244103-6 - Calle 81 11 55 Torre Norte Piso 9, Bogotá D.C. - contacto@vissogp.com - www.vissogp.com.

1. Purpose and Scope

This Policy governs the processing of personal data collected by VISSO CONSULTORES S.A.S. through its website, digital contact forms, PQRS channels (Petitions, Complaints, Claims, Suggestions, and Compliments), associated electronic channels, and technologies related to analytics, measurement, embedded content, and digital advertising.

Its purpose is to clearly inform data subjects about how their personal data is collected, used, stored, transmitted, and protected, as well as the mechanisms available to exercise their rights.

This Policy applies to:

- Visitors to the website;
- Individuals who complete contact or PQRS forms; and
- Users who interact with cookies or equivalent technologies on www.vissogp.com.



This document does not replace VISSO’s internal instruments for processing employee, contractor, or third-party data in non-web processes, which are governed by the Corporate Policy 2026 and the Data Privacy and Management Policy 2025.

2. Data Controller and Contact Channel

The Data Controller is **VISSO CONSULTORES S.A.S.** The primary channel for inquiries, requests, and claims related to data protection is:

Email: contacto@vissogp.com

Website: www.vissogp.com

Data subjects may also submit written requests to the physical address indicated above.

For operational purposes, VISSO will handle requests through the designated corporate channel, coordinated by the Compliance and Corporate Governance Department with support from the relevant operational areas.

| Campo | Contenido |
|---------------------------|--|
| Corporate Name | VISSO CONSULTORES S.A.S. |
| Tax ID (NIT) | 901244103-6 |
| Address | Calle 81 11 55 Torre Norte Piso 9, Bogotá D.C., Colombia |
| Habeas Data Contact Email | contacto@vissogp.com |
| Website | www.vissogp.com |
| Covered Channels | Website, contact form, PQRS channels, and cookies/web technologies |

3. Personal Data Collected by VISSO

VISSO may collect the following categories of personal data:

- Identification and Contact Data: Name, email address, company, job title, phone number, and message provided through forms.
- PQRS-Related Data: Type of request, description of facts, supporting documents, and contact information.
- Technical and Browsing Data: IP address, cookie identifiers, date and time of visit, pages viewed, traffic source, interaction events, and usage metrics.



- Third-Party and Embedded Content Data: Data derived from tools such as YouTube video players, measurement tags, and advertising platforms.

VISSO does not design its web forms to collect sensitive data, résumés, or data relating to children or adolescents. Users are therefore requested not to submit such information unless legally required or expressly requested by VISSO.

4. Purposes of Data Processing

Forms and Direct Engagement

- Respond to contact requests, commercial or institutional inquiries, and meeting requests.
- Process petitions, complaints, claims, suggestions, and compliments (PQRS).
- Manage responses, track interactions, and retain supporting documentation.

Operations, Security, and Compliance

- Protect website security and prevent abuse, fraud, unauthorized access, or cybersecurity incidents.
- Comply with legal, regulatory, contractual obligations, and requirements from competent authorities..

Analytics, Content, and Digital Measurement

- Measure website performance and improve user experience, content, and web architecture.
- Evaluate the impact of digital campaigns and, where consent is granted, support segmentation and remarketing initiatives.
- Enable embedded content or third-party functionalities such as YouTube videos.

5. Legal Basis and Authorization

VISSO will obtain prior, express, and informed authorization when required by law and will retain verifiable evidence thereof. Authorization may be granted in writing, verbally, or through unequivocal conduct.

Authorization shall not be required in cases expressly provided by law, such as:

- Publicly available data;
- Information requested by competent authorities; or
- Other legally established circumstances.



For non-essential cookies or similar technologies, VISSO will implement mechanisms to inform users and obtain consent before activation.

6. Data Subject Rights

Data subjects have the right to:

- Know, update, and rectify their personal data.
- Request proof of authorization granted.
- Be informed about the use of their personal data.
- Submit inquiries and complaints to VISSO and, subsequently, to the Superintendence of Industry and Commerce (SIC).
- Revoke authorization and/or request data deletion when legally applicable.
- Access their personal data free of charge.

7. Procedures for Inquiries, Complaints, Revocation, and Deletion

Requests must be submitted via contacto@vissogp.com or in writing to the physical address of the Data Controller. Requests must include sufficient information to identify the Data Subject, describe the facts or the right they intend to exercise, and provide any supporting documentation they wish to submit.

- Inquiries: VISSO will respond within ten (10) business days. If additional time is required, the response period may be extended by five (5) additional business days.
- Complaints: If incomplete, VISSO may request corrections within five (5) business days. Once complete, the maximum response period shall be fifteen (15) business days, extendable by eight (8) additional business days.
- Revocation and Deletion: These will proceed when there is no legal or contractual obligation to retain the data. VISSO will provide accessible and free mechanisms for such requests.

8. Sensitive Data and Data of Minors

VISSO does not require sensitive personal data or data relating to children and adolescents for the ordinary use of its website.

If such data is exceptionally required in compliance with legal provisions:



- The data subject will be informed that authorization is optional;
- The purpose will be specified; and
- Explicit consent will be obtained when necessary.

If such data is submitted inadvertently, VISSO will apply data minimization and secure handling measures

9. Cookies and Similar Technologies

The website may use first-party and third-party cookies for technical, measurement, user experience, digital advertising, and embedded content purposes. The categories effectively used may vary over time; however, this version contemplates, at a minimum, the following technologies or providers confirmed by VISSO:

| Category / Supplier | Main Purpose |
|---|--|
| Analytics and Performance | Google Analytics and Hotjar, used to measure traffic, analyze browsing behavior, track events, and evaluate website performance. |
| Advertising and Attribution | Meta Pixel and LinkedIn Insight Tag, used for campaign measurement, audience analysis, and advertising attribution, where consent for non-essential cookies has been granted. |
| Embedded Content | YouTube, when the website integrates or reproduces videos from this platform. |
| Technical or Strictly Necessary Cookies | Cookies from the website management system, hosting provider, or security services, required for functionality, session management, stability, load balancing, and technical administration. |

Regla operativa recomendada

Non-essential cookies will remain disabled until accepted by the user. Refusal will not prevent access to the website, except for functionalities that depend on such technologies.



10. National and International Transfer and Transmission of Personal Data

VISSO may transmit or grant access to personal data to technology providers acting on its behalf to operate the website, host information, measure usage, manage content, or execute advertising and analytics tools. For this version, VISSO anticipates web infrastructure managed through Cloudlogin and/or environments associated with us.cloudlogin.co, as well as the use of cookie providers and digital services that may process information outside Colombia.

Where the processing involves data transmission to Data Processors acting on behalf of VISSO, the company will endeavor to support such processing through agreements incorporating security, confidentiality, and data processing obligations. In the event of an international data transfer, VISSO will apply the applicable legal requirements and, where necessary, obtain authorizations or adopt additional safeguards.

Due to the nature of the internet and certain third-party services, the exact location of data processing may vary. VISSO will update this Policy whenever substantial changes are identified in service providers, processing purposes, or data architecture.

11. Information Security and Data Retention

VISSO adopts reasonable administrative, technical, and organizational measures to protect personal data against loss, misuse, unauthorized access, alteration, or disclosure. These measures include access controls, need-to-know restrictions, incident management procedures, backup mechanisms, and secure custody commensurate with the level of risk.

Personal data shall be retained for as long as necessary to fulfill the purposes communicated herein, comply with legal or contractual obligations, and maintain traceability of the relationship or request. Thereafter, such data shall be deleted, anonymized, or blocked, as applicable.

12. Validity and Amendments

This Policy shall become effective upon its publication on www.vissogp.com and may be updated whenever there are changes in applicable regulations, technological architecture, data processing purposes, or relevant service providers.

When such changes are substantial and affect the identification of the Data Controller or the purposes of data processing, VISSO shall communicate them prior to, or at the latest at the time of, their implementation, and shall obtain new authorization if the change in purpose so requires.



13. Applicable Legal Framework

This Policy is governed by the laws of the Republic of Colombia, including:

- Article 15 of the Political Constitution of Colombia;
- Law 1581 of 2012;
- Decree 1074 of 2015;
- Guidelines issued by the Superintendence of Industry and Commerce (SIC).