**POLICY OF TREATMENT AND PROTECTION OF PERSONAL DATA**

DINAGER SAS operating company in accordance with the provisions of Law 1581 of 2012 and decree 1377 of 2013, adopts the following: policy for the processing of personal data, which informs all owners or owners of the data collected or which In the future they are obtained as a result of commercial relations in the exercise of tourism, cultural, environmental, labor or other activities derived from our commercial activity ..

Money guaranteed and guaranteed the rights to privacy, privacy, good name and protection of Information, in the processing of personal data, and accordingly all actions will be governed by the principles of legality, purpose, freedom, truthfulness, quality, transparency , Access and restricted circulation, and confidentiality.

**RESPONSIBLE FOR DATA PROCESSING**

Company Name : Dianger sas

Addr: Cra 70 , Manzana 4, Lot 10 Local 4 Piso 1

Telephon: (57 5) 6610414

E-Mail: dinager@dinage.com

**Web Page: www.dinager.com**

**Laws**

Ley 1266 de 2008

Ley 1581 de 2012

Decretos Reglamentarios 1727 de 2009 y 2952 de 2010, Decreto Reglamentario parcial 1377 de 2013

**SCOPE**

The present policy will be applicable to the personal data registered in any database or documents of DINAGER and whose holder is a natural or legal person

**DEFINITIONS**

Privacy Notice: Verbal or written communication generated by the Responsible, addressed to the Owner for the processing of their personal data, which informs them about the existence of the information processing policies that will apply to him, how to access To the same and the purposes of the treatment that is intended to give the personal data.

Database: Organized set of personal data that is subject to treatment.

Personal data: Any information linked to or associated with one or more specific or determinable natural persons.

Public data: It is the data that is not semi-private, private or sensitive Responsible for the Treatment: Natural or legal person, public or private, that by itself or in association with others, perform the processing of personal data on behalf of the Responsible for Treatment.

Responsible for the Treatment: Natural or juridical person, public or private, that by itself or in association with others, decides on the data base and / or the Treatment of the data.

Holder: Natural person whose personal data are subject to Treatment.

Treatment: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

Transfer: The data transfer takes place when the person responsible for processing personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is responsible for the treatment and is inside or outside from the country.

Transmission: processing of personal data that involves the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a treatment by the manager on behalf of the responsible.

**PRINICIPLES**

In order to guarantee the protection of personal data, DIANGER will apply in a comprehensive manner the following principles, in light of which the processing, transfer and transmission of personal data must be carried out:

Principle of legality in the matter of data processing: The processing of data is a regulated activity, which must be subject to the current and applicable legal provisions govern the subject.

Principle of purpose: the activity of the processing of personal data performed by DINAGER or to which it has access, will have a legitimate purpose in accordance with the Political Constitution of Colombia, which must be informed to the respective holder of the personal data.

Principle of freedom: the processing of the personal data can only be done with the consent, previous, express and informed of the Holder. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal, statutory, or judicial mandate that relieves consent.

Principle of veracity or quality: the information subject to Processing of personal data must be truthful, complete, accurate, updated, verifiable and understandable. Treatment of partial, incomplete, fractional or error-inducing data is prohibited.

Principle of transparency: In the processing of personal data, DINAGER will guarantee to the Holder its right to obtain at any time and without restrictions, information about the existence of any type of information or personal data that is of interest or ownership.

Principle of access and restricted circulation: The processing of personal data is subject to the limits that derive from the nature of these, the provisions of the law and the Constitution. Consequently, the treatment can only be done by persons authorized by the holder and / or by the persons provided for by law. Personal data, except for public information, may not be available on the internet or other means of mass communication or communication, unless access is technically controllable to provide restricted knowledge only to holders or third parties authorized by law.

Safety Principle: Information subject to treatment by must be handled with the technical, human and administrative measures that are necessary to provide security to the registries avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

Principle of confidentiality: All persons who manage, manage, update or have access to information of any kind found in Databases are obliged to guarantee the reservation of the information in DIANGER, so they undertake to preserve and maintain Strictly confidential and not reveal to third parties, all the information they come to know in the execution and exercise of their functions; Except in the case of activities authorized expressly by the data protection law. This obligation persists and will be maintained even after the end of its relationship with any of the tasks included in the Treatment.

**RIGHTS OF THE INFORMATION HOLDER**

In accordance with what is contemplated by the current regulations applicable to data protection, the following are the rights of the holders of personal data:

. Access, know, update and rectify your personal data in front of DIANGER as responsible for the treatment.

. Request proof of authorization granted to DINAGER for the processing of data, by any valid means, except in cases in which the authorization is not necessary.

Be informed by DIANGER, upon request, regarding the use that he has given to his personal data.

. To revoke the authorization and / or request the suppression of the data when in the Treatment the principles, rights and constitutional and legal guarantees are not respected.

. Free access to your personal data that have been processed, at least once every calendar month, and whenever there are substantial changes to this policy that motivate further consultations.

Rights of children and adolescents

The treatment of personal data will ensure respect for the prevailing rights of minors.

The processing of personal data of minors is prohibited, except for those data that are public in nature, and in this case the treatment must comply with the following parameters:

to. Respond and respect the best interests of minors

B. Ensure respect for the fundamental rights of minors.

It is the task of the State and educational institutions of all types to provide information and training to legal representatives and tutors on the possible risks faced by children and adolescents regarding the improper treatment of their personal data and to provide knowledge about The responsible and safe use by children and adolescents of their personal data, their right to privacy and protection of their personal information and that of others.

**DUTIES OF DINAGER AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA**

DIANAGER recognizes the ownership that of the personal data of the people and consequently they can exclusively decide on the same. Therefore, Dinager will use the personal data for the fulfillment of the purposes expressly authorized by the owner or by the current regulations.

Dinager shall have the following duties, without prejudice to other duties provided for in the provisions that regulate or come to regulate this matter:

to. To guarantee the holder, at all times, the full and effective exercise of the right of habeas data.

B. Request and keep, copy of the respective authorization granted by the holder for the processing of personal data.

C. Duly inform the owner about the purpose of the collection and the rights that assist him by virtue of the authorization granted.

D. Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.

and. Ensure that the information is truthful, complete, accurate, up-to-date, verifiable and understandable.

F. Update the information in a timely manner, responding in this way to all the novelties regarding the data of the holder. In addition, all necessary measures must be implemented so that the information is kept up to date.

G. Correct the information when it is incorrect and communicate the pertinent.

H. Respect the conditions of security and privacy of the information of the holder.

I. To process the consultations and claims formulated in the terms indicated by the law.

J. Identify when certain information is under discussion by the holder.

K. Inform at the request of the owner about the use given to their data.l. Informar a la autoridad de protección de datos cuando se presenten violaciones a los códigos de seguridad y existan riesgos en la administración de la información de los titulares.

m. Cumplir los requerimientos e instrucciones que imparta la Superintendencia de

Industria y Comercio sobre el tema en particular.

N. Only use data that has previously been authorized in accordance with the provisions of Law 1581 of 2012.

or. To ensure the proper use of the personal data of children and adolescents, in those cases where the processing of their data is authorized.

P. Record in the database the legend "claim in process" as it is regulated by law.

Q. To insert in the database the legend "information in judicial discussion" once notified by the competent authority about judicial processes related to the quality of personal data.

R. Refrain from circulating information that is being disputed by the owner and whose blockade has been ordered by the Superintendency of Industry and Commerce

S. Allow access to information only to people who can access it.

T. Use the personal data of the holder only for those purposes for which he is duly authorized and respecting in any case the current regulations on protection of personal data.

AUTHORIZATION AND CONSENT OF THE HOLDER

Dinager requires the free, prior, express and informed consent of the holder of the personal data for the treatment of the same, except in cases specifically authorized by law, namely:

to. Information required by a public or administrative entity in the exercise of its legal functions or by court order.

B. Data of a public nature.

C. Cases of medical or health emergency.

D. Treatment of information authorized by law for historical, statistical or scientific purposes.

and. Data related to the Civil Registry of Persons

Manifestation of authorization

The authorization will be granted by:

• The owner,

• The assignees of the holder, who must prove such quality.

• The representative and / or proxy of the holder, after accreditation of the representation or empowerment.

• Other in favor or for which the owner has stipulated.

Means for granting authorization

Dianger will obtain authorization through different means, including the physical document, electronic, data message, Internet, Websites, or any other format that in any case allows the obtaining of consent through unequivocal conduct through which it is concluded that If it had not been supplied by the owner or the person entitled to do so, the data would not have been stored or captured in the database.

**TREATMENT TO WHAT THE DATA AND THE PURPOSE OF THE SAME WILL BE SUBMITTED**

The processing of personal data with DIANGER will take place in the legal framework that regulates the subject by virtue of its condition of Tour Operator and will be all necessary for the fulfillment of the corresponding work.

**NOTICE OF PRIVACY**

The Privacy Notice is the physical document, electronic or in any other format, made available to the owner to inform you about the treatment of your personal data. Through this document, the holder is informed of the information related to the existence of the information processing policies of Dinager and that will be applicable to him, the way of accessing them and the characteristics of the treatment intended to be given to personal data .

**PROCEDURE FOR THE ATTENTION OF CONSULTATIONS, CLAIMS, REQUESTS FOR RECTIFICATION, UPDATE AND SUPPRESSION OF DATA**

to. Inquiries:

The holders or their successors in title may consult the personal information of the holder who is in DINAGER, who will supply all the information contained in the individual registration or that is linked to the identification of the Owner.

With respect to the attention of requests for consultation of personal data DINAGER guarantees:

• Enable electronic or other means of communication that you deem relevant.

• Establish forms, systems and other simplified methods, which should be informed in the privacy notice.

• Use the services of customer service or claims that you have in operation.

• In any case, regardless of the mechanism implemented for the attention of requests for consultation, they will be attended in a maximum term of ten (10) d Days counted from the date of receipt. When it is not possible to attend the consultation within that term, the interested party will be informed before the expiration of the 10 days, stating the reasons for the delay and indicating the date

In which your query will be attended, which in no case may exceed five (5) days

Following the maturity of the first installment.

• Consultations may be made via e-mail to: dinager@dinager.com

B. Claims

The Holder or his assignees who consider that the information contained in a database must be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the law, may file a complaint with DINAGER, the Which will be processed under the following rules:

1. The claim of the Holder shall be made by means of an application addressed to DINAGER to dinager@dinager.com or by written communication addressed to the company.

2. The maximum term to attend the claim shall be fifteen (15) working days from the day following the date of receipt. When it is not possible to attend a complaint within that term, the interested party will be informed of the reasons for the delay and the date on which their claim will be dealt with, which in no case may exceed eight (8) business days following the expiration of the first term .

C. Petition for updating and / or rectification

DINAGER shall rectify and update, at the request of the holder, the information of the latter that proves to be incomplete or inaccurate, in accordance with the procedure and terms mentioned above, for which account shall be taken of:

1. The holder must submit the request to the electronic mail dinager@dinager.com physical medium addressed to the Department of Institutional Marketing indicating the update and / or rectification to be made and will provide the documentation that supports his request.

2. DINAGER may provide mechanisms to facilitate the exercise of this right to the holder, as long as they benefit. Consequently, electronic or other means that may be relevant may be enabled, which will be informed in the privacy notice and will be made available to those interested in the website.

D. Request for deletion of data

The holder of the personal data has the right to ask DINAGER for its deletion (deletion) in any of the following events:

1. Consider that they are not being treated in accordance with the principles, duties and obligations provided in the current regulations.

2. They are no longer necessary or relevant for the purpose for which they were collected.

3. The period necessary for the fulfillment of the purposes for which they were collected has been exceeded

This deletion implies the total or partial elimination of personal information as requested by the owner in the registers, files, databases or treatments performed by DINAGER. However, this right of the holder is not absolute and consequently DINAGER may deny the exercise of the same when:

to. The holder has a legal or contractual duty to remain in the database.

B. The elimination of data obstructs judicial or administrative actions related to fiscal obligations, investigation and prosecution of crimes or the updating of administrative sanctions.

C. The data are necessary to protect the holder's legally protected interests; To perform an action in the public interest, or to comply with an obligation legally acquired by the owner.

**NATIONAL DATABASE REGISTRY**

DINAGER reserves the right, in the events contemplated in the law and in its statutes and internal regulations, to maintain and catalog certain information that remains in its databases or databases, as confidential according to the norms

Regulations and bylaws.

**INFORMATION SECURITY AND SAFETY MEASURES**

In compliance with the security principle established in the current regulations, DINAGER will adopt the necessary technical, human and administrative measures to grant security to the registries, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

**USE AND INTERNATIONAL TRANSFER OF PERSONAL DATA AND PERSONAL INFORMATION BY DINAGER**

In compliance with the institutional mission and the strategic development plan of DINAGER, and taking into account the nature of the permanent or occasional relations that any person holding personal data may have for DINAGER, it may perform the transfer and transmission, including international, Of all personal data, provided that the applicable legal requirements are met; And consequently the holders with the acceptance Civil, and its accountants, auditors, lawyers and other advisers and representatives, because it is necessary or appropriate: (a) to comply with applicable laws, including laws other than those of your country of residence; (B) to comply with legal proceedings; (C) to respond to requests from public authorities and the government, and to respond to requests from public authorities and government other than those in their country of residence; (D) to enforce our terms and conditions; (E) to protect our operations; (F) to protect our rights, privacy, security or property, yours or those of third parties; And (g) obtain the applicable compensation or limit damages that may affect us.

**RESPONSIBLE AND RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA DINAGER**

will be responsible for the processing of personal data. The Institutional Marketing Department will be in charge of the processing of personal data, on behalf of DINAGER

VALIDITY This policy is effective as of January 15, 2017 It is with the acceptance.