

**PERSONAL DATA PROCESSING AND INFORMATION
MANAGEMENT POLICIES AND PROCEDURES
FOR DOCUMENT MANAGEMENT SOLUTIONS
FUJIFILM COLOMBIA S.A.S. (Hereinafter, FUJIFILM
COLOMBIA).**

Content

I. DEFINITIONS9

II. IDENTIFICATION DETAILS OF DATA CONTROLLER.....9

III. PERSONAL DATA PROTECTION COMPLIANCE OFFICER.....9

In compliance with the current regulations in this matter, FUJIFILM COLOMBIA has appointed Ms. Zaira Pinto as Personal Data Protection Compliance Officer; thus, as processor of consultations, requests, complaints, and/or claims, whose details are as follows:9

IV. SCOPE AND OBJECTIVES9

V. SCOPE OF APPLICATION AND REGULATORY FRAMEWORK9

VI. PERSONAL DATA PROCESSING GENERALITIES.....9

VII. AUTHORIZATION FROM OWNER.....9

VIII. MANAGEMENT OF SENSITIVE DATA.....9

IX. AUTHORIZATION FROM OWNER.....9

X. MANAGEMENT OF SENSITIVE DATA9

XI. PROCESSING AND OBJECT OF THE PERSONAL DATA PROCESSING9

a. On the Personal Data provided by Clients; Direct distributor clients, Clients – Photo Wonder Shop Store; Serie X / Welcu Platform Registration / Launchings; Series X / Image Use Form; Graphic / Welcu Platform Registration; Wix Page / Records; Store Sellers; Comerssia Users.9

b. On the Personal Data of Employees; Contractors; New Employees; Temporary Employees; Covid-19 Signs and Symptoms Report; Training Forms; Biometric Databases; General Symptom and Acute Respiratory Infection (ARI) Report:9

c. On the Personal Data of Former Employees:.....9

- d. On the Personal Data of Visitors:.....
- XII. RIGHTS OF PERSONAL DATA OWNERS.....
- XIII. PROCEDURES.....
 - A. PROCEDURES THAT MUST BE CARRIED OUT BY DATA OWNERS TO EXERCISE RIGHTS RELATED TO THEIR PERSONAL DATA:.....
 - i. For Consultations and/or Queries:
 - ii. For Claims:
 - B. INFORMATION SECURITY:.....
 - C. PROCEDURE FOR THE PREPARATION AND COMPLETION OF THE PERSONAL DATA CENTRAL REGISTER:.....
 - D. PROCEDURE TO HANDOVER PERSONAL DATA TO COMPETENT AUTHORITIES:
- XIV. DUTIES OF PERSONAL DATA CONTROLLERS AND/OR PROCESSORS:.....
 - a. Duties of Data Controllers:
 - b. Duties of Data Processors:
 - c. Joint Duties of Controllers and Processors:.....
- XV. COMMUNICATION AND/OR ASSIGNMENT OF PERSONAL DATA AND PROCESSING OF PERSONAL DATA OF CHILDREN AND ADOLESCENTS
- XVI. INTERNATIONAL TRANSFER AND/OR TRANSMISSION OF DATABASES.....
- XVII. MANUAL REVISION PROCESS.....
- XVIII. CHANGE CONTROL
- XIX. SIGNATURES AND AUTHORIZATIONS

I. DEFINITIONS

This list contains the definitions of the abbreviations and terms used in this document.

Privacy Notice: Document by means of which the controller notifies personal data owners about the existence of the data processing policies and the way to gain access, as well as the intended object, of the personal data.

Authorization: Prior, express and informed consent of the Data Owner to carry out the processing of its personal data, which must be obtained by any means that may be subject to subsequent consultation; this authorization shall be deemed compliant with the requirements when it is in writing, verbally, or through unequivocal conducts of the Owner that lead to reasonably conclude that it granted authorization.

This authorization must be requested by the Controller, no later than on the time the data is gathered, and the same must notify the owner about the object of the collection and the channels of communication by means of which Owners can exercise their rights before the Controller and/or the Processor, as well as the power of the Owner to give or refuse to respond to questions related to sensitive data or about data related to minors.

Automated Databases: Automated databases are those that are stored and managed with help from electronic or computer tools.

Manual Databases: Manual databases or archives are those with information organized and stored in physical form.

Personal data base: Organized set of personal data used to maintain the registration and information thereof, whether in physical form or through electronical means, regardless of the number of personal data contained therein. Databases may be subject to automated or manual processing, within Colombian territory or outside the same.

Service Channels for the Owner: These refer to the different channels FUJIFILM COLOMBIA, as personal data Controller and/or Processor, has made available to owners to exercise the rights to know, update, rectify, and revoke the information gathered on these in the archive and data banks, whether public or private, and in general, the ones under Law 1581 of 2012 and other applicable norms.

Assignment of Data: This is understood as the processing of data intended for disclosure to a person other than the owner of the data, or other than the one enabled as assignee.

Client: Natural or legal person to which FUJIFILM COLOMBIA has rendered professional services by virtue of a preexisting commercial relationship.

Collaborators: For the purposes of this manual, collaborators are understood as the workers of FUJIFILM COLOMBIA, as well as individuals rendering their services for specific matters under a service contract.

Personal Data: Every information associated or related to a person that allows identifying that person. For instance, the identity document, the place of birth, the marital status, the age, the place of residence, the academic, labor, or professional record. There is also more sensitive information such as the health condition, physical traits, political ideology, sexual life, etc.

Private Data: Intimate and reserve data only relevant for its owner.

Public Data: Data as such, according to the Political Constitution of Colombia, denominated as such, which is not semi-private or private. For instance: data in public documents, final court sentences, etc.

Semi-Private Data: Data that is not intimate, reserved, or public in nature, which may be of interest, when disclosed, not only to its owner, but to a sector of people. For instance, financial and credit data of a commercial or service activity.

Sensitive Data: Data that may affect the intimacy of its holder, or that may generate discrimination when used in undue form. For instance, Sensitive Data includes information related to racial or ethnic origin, political orientation, religious or philosophic convictions, belonging to unions, social, human rights organizations, or organizations that promote the interests of any political party or that ensure the rights and guarantees of opposing political parties, among others, as well as data related to the health, sexual life and biometric details.

Employee: Natural person who provides personal services to FUJIFILM COLOMBIA by virtue of a work contract.

Data Processor: Natural or legal person who, by itself or in cooperation with others, performs the Processing of personal data on behalf of the Controller. For the purposes of the regulatory framework on personal data protection, the Processor is a third party other than the company; therefore, it shall not be confused with the employee who inside the organization manages or utilizes the database.

Former Employee: Natural person who provided personal services to FUJIFILM COLOMBIA by virtue of a work contract that ended for any cause.

Habeas Data: Is the right of all persons to know, update, and rectify the information gathered about the same on files and databases, whether public or private, which ensures that all citizens may decide on and control their personal information.

Personal Data Protection Compliance Officer: Person appointed by FUJIFILM COLOMBIA to assume the function of protecting personal data, who shall be the one that processes requests from Owners, with the object of exercising the rights to know, update, rectify, and revoke the information gathered on them in files and databanks, whether public or private, and in general, those established under Law 1581 of 2012 and other applicable norms.

FUJIFILM COLOMBIA: Understood as FUJIFILM COLOMBIA S.A.S.

Potential Client: Natural or legal person from whom FUJIFILM COLOMBIA receives data for the purpose of submitting a service proposal.

Supplier: Natural or legal person who provides goods and/or service to FUJIFILM COLOMBIA by virtue of a preexisting commercial relationship.

Controller: Natural or legal person who decides on the database and/or the Processing of data. For the purposes of this manual, FUJIFILM COLOMBIA shall be considered as the data controller.

RNBD: National Database Register, which is the public directory of databases subject to processing that operate in the country, which shall be managed by the Superintendence of Industry and Commerce and can be accessed freely for consultation purposes.

SIC: Superintendence of Industry and Commerce.

Third Parties: For the purposes of this manual, third parties shall be construed as suppliers, clients, and any third party with a commercial relationship with FUJIFILM COLOMBIA.

Owner of Information: Natural or legal person whom the information in a database pertains to, subject to Habeas Data.

Transfer: A transfer of personal data is understood as when the personal data Controller and/or Processor located in the Country forwards personal data to a receiver, who is also a Controller inside or outside Colombia.

Transmission: A Transmission occurs with there is processing of personal data involving the dissemination thereof inside or outside the country, intended for the performance of a processing by the Processor on behalf of the Controller.

Processing: Processing is any operation or set of operations on personal data, such as the collection, storage, use, circulation, or deletion thereof, among others.

User: Natural or legal person that may access the personal information of one or many owners of information.

Personal Data Breach: Understood as the crime enshrined in Article 269 F of the Colombian Criminal Code, which provides as follows: “A person who, without being authorized to do so, for own benefit or the benefit of a third party, obtains, compiles, extracts, offers, sells, exchanges, sends, purchases, intercepts, disseminates, modifies, or employs personal codes, personal data contained in databases, files, databases or similar means, shall incur in imprisonment between forty-eight (48) and ninety-six (96) months, as well as a fine from 100 to 1000 current monthly legal minimum salaries”.

Breach of Personal Data Security Measures: This shall be understood as any situation that involves a breach of the security measures adopted by FUJIFILM COLOMBIA to protect the personal data under its custody, whether as Controller and/or Processor, as well as any other conduct that constitutes an undue processing of the personal data against the provisions herein or those established by Law. All security incident that compromises personal data shall be notified to the respective control authority.

Visitors: For the purposes of this manual, a Visitor shall be every natural person located at the facilities of FUJIFILM COLOMBIA who does not have the capacity of an Employee.

II. IDENTIFICATION DETAILS OF DATA CONTROLLER

Company Name: FUJIFILM COLOMBIA S.A.S.

Tax ID: 900.561.861-6

Domicile: Bogotá – Colombia

Address: Cra 15 No. 88 – 64 Of. 402 & 403

Email: ffco.callcenter@fujifilm.com

Tel: 57 1 5190806

Website: www.fujifilmamericas.com.co

FUJIFILM COLOMBIA reserves the right to unilaterally modify, at any time, its personal data processing and privacy policy. We shall not restrict rights derived from this Information Processing Policy and of use of personal data without express consent. We shall publish any modification to Personal Data Use and Privacy Policy in this website. Furthermore, we shall maintain prior versions of this Personal Data Use and Privacy Policy.

III. PERSONAL DATA PROTECTION COMPLIANCE OFFICER

In compliance with the current regulations in this matter. FUJIFILM COLOMBIA has appointed Ms. Zaira Pinto as Personal Data Protection Compliance Officer; thus, as processor of consultations, requests, complaints, and/or claims, whose details are as follows:

Address: Cra. 15 No. 88 – 64 Of. 402 & 403

Email: ffco.callcenter@fujifilm.com

Tel: 57 1 5190806

IV. SCOPE AND OBJECTIVES

The objective of this manual is to ensure the rights of all persons to know, update, rectify, and revoke the information gathered on them in the databases or files of FUJIFILM COLOMBIA, as well as to provide to the collaborators of FUJIFILM COLOMBIA, suppliers and third parties, guidelines for the proper management of personal data and information, ensuring the security in the use of that information and the compliance with the legal standards established by the Colombian legal system, taking into account that for the performance of our operation, FUJIFILM COLOMBIA continually gathers and processes databases that contain personal data and information.

It is worth mentioning that at the time the owners of data provides, delivers, or sends any type of personal information to FUJIFILM COLOMBIA, it accepts for that information to be used in accordance with this manual, clarifying that said information shall not be used for activities or purposes other than the ones established herein; in any case, in the event said personal information is used for other purposes, its use shall be protected by any of the exceptions established in this respect by the regulations or shall have the express authorization of the Owner.

For FUJIFILM COLOMBIA, ensuring respect and safeguarding the rights of its clients, employees, suppliers and third parties in general, is a constant commitment. In view of this, we have adopted the following personal data processing and information management policies and procedures manual, which is mandatory during all the activities that fully or partially involve the gathering, storage, use, circulation, and transfer of said information.

The rules adopted in this Manual shall be adapted to the international standards related to personal data protection.

V. SCOPE OF APPLICATION AND REGULATORY FRAMEWORK

This manual applies to the auditors and/or tax auditors, if applicable, officials and collaborators at all levels of FUJIFILM COLOMBIA, legal representatives and administrators, suppliers and third parties in general, who render their services to FUJIFILM COLOMBIA under any contract modality, visitors, and every person in condition of user of the personal data and to those it applies to under the current applicable regulations.

This manual applies for all databases in possession of FUJIFILM COLOMBIA and the personal data therein. Furthermore, it also applies for the relationships between FUJIFILM COLOMBIA as controller and any of its processors.

It shall apply to the processing of personal data carried out inside Colombian territory, or when applicable, or when the norm applies to the controller and/or processor located outside Colombian territory, by virtue of international treaties, contractual relations, etc.

The principles and provisions in this manual shall apply to any personal data base in possession of FUJIFILM COLOMBIA, whether as controller and/or processor.

This manual shall apply to personal data registered in any database that makes the same susceptible to processing in possession of FUJIFILM COLOMBIA, it shall also apply for the owners of the personal information used and/or included in the databases of FUJIFILM COLOMBIA, who shall act in the capacity of personal data controller.

This information can be obtained in means such as i) commercial or professional relationship with the respective client, supplier, or other third party; ii) work relationship with employees and former employees; iii) application to selection processes; iv) attendance to practices, seminars, or courses; and v) submission of email messages requesting information, among others.

The manual is based on the regulatory framework of personal data protection, which is intended to safeguard the information entrusted upon us. Our intention is to exclusively gather the information voluntarily provided by our clients, suppliers, employees, former employees, collaborators, visitors, third parties, etc.

The regulatory framework applicable to this manual is the following: Article 15 of the Political Constitution of Colombia, Law 1266 of 2008, Decree 1727 of 2009, Decree 2952 of 2010, Law 1581 of 2012, Resolution 76434 of 2012, Decree 1377 of 2013, Decree 886 of 2014, Circular Letter 02 of 2015, Sole Circular Letter of the Superintendence of Industry and Commerce – Title V, Sentences of C – 1011 of 2008, and C – 748 of 2011 issued by the Constitutional Court.

Article 15 of the Constitution of the Republic of Colombia provides that any person is entitled to know, update, and rectify personal data existing with respect to them in databases or files of public or private entities. Furthermore, it orders those with possession of personal details of third parties to honor the rights and guarantees provided in the Constitution when gathering, processing, and circulating this type of information.

Statutory Law 1581 of October 17, 2012 provides the minimum conditions to carry out the legitimate processing of personal data of clients, employees, and any other natural person. Subsection k) of article 18 of that law obliges personal data controllers to “adopt an internal manual for policies and procedures in order to ensure due compliance with this law and, specially, to respond to queries and claims”.

Article 25 of that same law provides that data processing norms are mandatory, and disregarding the same shall cause penalties, those norms cannot ensure a level of processing lesser than the one established under Law 1581 of 2012.

In accordance with Law 1273 of 2009, persons incur in personal data breaches when “without being authorized to do so, for own benefit or the benefit of a third party, they obtain, compile, extract, offer, sell, exchange, forward, purchase, intercept, disseminate, modify, or employ personal codes, personal data in files, archives, databases or similar media”.

VI. PERSONAL DATA PROCESSING GENERALITIES

1. The processing of personal data can only be carried out with prior, expressed, and informed consent from the owner; therefore, personal data cannot be obtained, processed, or disseminated without authorization from the owner, except when there is a legal or judicial order that replaces the consent of the owner.
2. Personal data gathered must be accurate, complete, exact, verifiable, comprehensible and be maintained up to date; therefore, processing of partial, fractional, incomplete, or misleading data is prohibited.
3. During the processing of personal data, the right of the owner to obtain and know information about the existence of the respective data from the controller and/or processor, at any time and without any restriction, must be ensured.
4. Personal data gathered or processed by FUJIFILM COLOMBIA shall only be used for the purpose and under the authorization granted by the owner of the personal data; therefore, the same cannot be accessed, transferred, assigned, or communicated to third parties.
5. The personal data in custody of FUJIFILM COLOMBIA cannot be made available on the Internet or in any other means of mass dissemination; unless the access is technically controllable and secure and provides restricted disclosure only to the owners and authorized third parties in accordance with the law and the principles that govern this matter.
6. The gathering of personal data must consider the object of the processing and/or of the database; therefore, the same must be adequate, relevant, and non-excessive or disproportionate data with respect to the object. The gathering of personal data that is disproportionate with respect to the intended object is prohibited.
7. Once the object for which the personal data was gathered and/or processed is completed, its use shall cease; therefore, FUJIFILM COLOMBIA shall adopt all relevant security measures to this end.
8. FUJIFILM COLOMBIA, as controller or processor of personal data, as applicable, shall adopt physical, technological, and/or administrative security measures required to ensure the attributes of integrity, authenticity, and reliability of the personal data. FUJIFILM COLOMBIA, according to the classification of personal data, shall implement high, medium, or low security measures, applicable in each case, to prevent the tampering, loss, leakage, consultation, use or access of an unauthorized or fraudulent nature.
9. FUJIFILM COLOMBIA and all the persons intervening in the processing of personal data, have the professional obligation to safeguard and maintain the confidentiality of such data, obligation that shall survive the completion of the contractual and/or commercial relationship. To this end, FUJIFILM COLOMBIA shall implement data protection clauses in its contractual relationships.

10. FUJIFILM COLOMBIA shall notify the owners of personal data, as well as controllers and processors, about the content of this manual, including the applicable policies and procedures in terms of data protection; furthermore, it shall notify about the existence of personal data bases in its custody, the rights, and the exercise of Habeas Data by owners, proceeding with the registration required by law.

VII. AUTHORIZATION FROM OWNER

The processing of personal data in FUJIFILM COLOMBIA can only be carried out with prior, express, and informed consent from the owner. Personal data cannot be obtained, processed, or disseminated without this authorization, except when there is a legal or judicial order that replaces the consent of the owner, authorization that must be registered in any means that enables its subsequent consultation.

At the exact time any type of personal information is provided, delivered, or forwarded to FUJIFILM COLOMBIA, the Owner of the data must accept that information to be used in accordance with this manual, for Personal Data Processing purposes.

FUJIFILM COLOMBIA shall not use the data provided for activities or purposes other than those established herein; nevertheless, in the event said personal information is used for other purposes, its utilization shall be covered by any of the exceptions established in this respect by the regulations, or shall have express authorization from the Owner, which are listed in this Manual.

Notwithstanding the above, and in accordance with the Law, FUJIFILM COLOMBIA may Process the personal data, without requiring prior authorization, in the following cases:

1. Information required by a Public or Administrative Entity exercising its legal functions, or by a court order;
2. Public data (in accordance with the legal definition of this term);
3. Medical or health emergency cases;
4. Processing of information authorized by the Law for historic, statistical, or scientific purposes;
5. Data related to the Civil Registry of Individuals.

Except for the exceptions above, and within the legitimate objects inherent to the company object of FUJIFILM COLOMBIA, it shall not supply, distribute, commercialize, share, exchange with third parties and, in general, carry out any activity that compromises the confidentiality and protection of the gathered information, under no circumstance.

VIII. MANAGEMENT OF SENSITIVE DATA

In accordance with Statutory Law 1581 of 2012, the Processing of sensitive data is prohibited, except in the following cases:

- a) When the Owner has given its explicit authorization to that Processing, except when the granting of said authorization is not required by Law;
- b) When the Processing is required to safeguard the vital interests of the Owner, and the same is physically or legally incapacitated. In these cases, the legal representatives must grant their authorization;
- c) When the Processing is carried out in the course of their legitimate activities, and with all due guarantees, by a foundation; NGOs, association, or any other non-profit body, with political, philosophical, religious, or trade-union purposes, provided that the same exclusively pertains to its members or the persons that it maintains regular contact with, due to their respective object. In these cases, the data cannot be provided to third parties without authorization from the Owner;
- d) When the Processing pertains to data required for the gathering, exercise, or defense of a right in a court proceeding;
- e) When the object of the Processing is historic, statistical, or scientific in nature. In this case, measures aimed towards the deletion of the identity of the Owners must be adopted.

By virtue of the above, FUJIFILM COLOMBIA shall not gather or process sensitive personal data, unless expressly authorized by the owner, and in the cases established by law that do not require consent. Sensitive personal information that may be obtained from a personnel selection procedure, or by virtue of any visit that You carry out to our facilities, shall be protected through high security measures.

FUJIFILM COLOMBIA prohibits the access, use, management, assignment, communication, storage and any other processing of sensitive personal data without authorization from the owner of the personal data and/or of FUJIFILM COLOMBIA.

Noncompliance with this provision by the employees and/or collaborators of FUJIFILM COLOMBIA shall be deemed a serious breach, which may cause the termination of the work, civil, or commercial relationship, as applicable, without prejudice to the applicable legal actions.

Furthermore, breach of this prohibition by suppliers and/or third parties of FUJIFILM COLOMBIA shall be deemed as a serious cause for termination of the commercial relationship or contract, without prejudice to the applicable legal actions.

Sensitive data identified shall be notified to their owners, in order to remove the same, if they decide to do so; if this option is not possible, FUJIFILM COLOMBIA shall delete the same securely.

FUJIFILM COLOMBIA prohibits the access, use, assignment, communication, processing, storage, and any other processing of sensitive personal data that may be identified in an audit procedure.

IX. AUTHORIZATION FROM OWNER

The processing of personal data in FUJIFILM COLOMBIA can only be carried with prior, express, and informed consent of its owner, personal data cannot be obtained, processed, or disclosed without this authorization, except when there is a legal or judicial order that replaces the consent of the owner, authorization that must be recorded in any means that allows for its future consultation.

At the time any type of personal information is provided, submitted, or sent to FUJIFILM COLOMBIA, the Owner of the data must accept that said information will be utilized in accordance with this Personal Data Processing manual.

FUJIFILM COLOMBIA shall not use the data provided for activities or purposes other than those established herein; however, in the event that personal information is used for other purposes, its use shall be covered by one of the exceptions established in this respect by the regulations, or must have express authorization from the Owner, which are listed in this Manual.

Notwithstanding the above, and in accordance with the Law, FUJIFILM COLOMBIA may Process personal data without requiring prior authorization in the following cases:

1. Information required by a Public or Administrative Entity exercising its legal functions or by a court order;
2. Public data (in accordance with the legal definition of this term);
3. Case of medical or health emergency;
4. Processing of information authorized by Law for historic, statistical, or scientific purposes;
5. Data related to the Civil Registry of Individuals.

Except for the aforementioned exceptions, and within the legitimate purposes inherent to the company object of FUJIFILM COLOMBIA, it shall never supply, distribute, commercialize, share, exchange with third parties and, in general, carry out any activity in which the confidentiality and protection of the collected information is compromised.

X. MANAGEMENT OF SENSITIVE DATA

In accordance with Statutory Law 1581 of 2012, the Processing of sensitive data is prohibited, except in the following cases:

- a) When the Owner has given its explicit authorization to that Processing, except when the granting of said authorization is not required by Law;
- b) When the Processing is required to safeguard the vital interests of the Owner, and the same is physically or legally incapacitated. In these cases, the legal representatives must grant their authorization;
- c) When the Processing is carried out in the course of their legitimate activities, and with all due guarantees, by a foundation; NGO, association, or any other non-profit body, with political, philosophical, religious, or trade-union purposes, provided that the same exclusively pertains to its members or the persons that it maintains regular contact with, due to their respective object. In these cases, the data cannot be provided to third parties without authorization from the Owner;

- d) When the Processing pertains to data required for the gathering, exercise, or defense of a right in a court proceeding;
- e) When the object of the Processing is historic, statistical, or scientific in nature. In this case, measures aimed towards the deletion of the identity of the Owners must be adopted.

By virtue of the above, FUJIFILM COLOMBIA shall not gather or process sensitive personal data, unless expressly authorized by the owner, and in the cases established by law that do not require consent. Sensitive personal information that may be obtained from a personnel selection procedure, or by virtue of any visit that You carry out to our facilities, shall be protected through high security measures.

FUJIFILM COLOMBIA prohibits the access, use, management, assignment, communication, storage and any other processing of sensitive personal data without authorization from the owner of the personal data and/or of FUJIFILM COLOMBIA.

Noncompliance with this provision by the employees and/or collaborators of FUJIFILM COLOMBIA shall be deemed a serious breach, which may cause the termination of the work, civil, or commercial relationship, as applicable, without prejudice to the applicable legal actions.

Furthermore, breach of this prohibition by suppliers and/or third parties of FUJIFILM COLOMBIA shall be deemed as a serious cause for termination of the commercial relationship or contract, without prejudice to the applicable legal actions.

Sensitive data identified shall be notified to their owners, in order to remove the same, if they decide to do so; if this option is not possible, FUJIFILM COLOMBIA shall delete the same securely.

FUJIFILM COLOMBIA prohibits the access, use, assignment, communication, processing, storage, and any other processing of sensitive personal data that may be identified in an audit procedure.

XI. PROCESSING AND OBJECT OF THE PERSONAL DATA PROCESSING

The processing of personal data carried out by FUJIFILM COLOMBIA, as well as the permanence of the data in its information system, shall be determined by the purpose of said processing. This way, once the object for which the data was collected ends, FUJIFILM COLOMBIA shall eliminate or return the same, as applicable, or conserve the same in accordance with the law, adopting technical measures that prevent its undue processing.

Recipients of this Manual are prohibited from carrying out any processing of personal data that may cause any of the conducts described in the computer-related crimes law 1273 of 2009.

a. On the Personal Data provided by Clients; Direct distributor clients, Clients – Photo Wonder Shop Store; Serie X / Welcu Platform Registration / Launchings; Series X / Image Use Form; Graphic / Welcu Platform Registration; Wix Page / Records; Store Sellers; Comerssia Users

FUJIFILM COLOMBIA may carry out the Processing of personal information about its Clients for the purpose of providing the professional services contracted by them, in accordance with the company object of FUJIFILM COLOMBIA, in this sense, contractual documents signed with Clients shall be governed by the provisions of the Manual, and shall include a clause that regulates the Processing of information acceded by virtue thereof, in which a provision is agreed on the damages that may be caused against FUJIFILM COLOMBIA as a result of the imposition of fines, operational penalties, among others, by competent authorities and as a result of reckless and negligent actions by the client.

FUJIFILM COLOMBIA may carry out the processing of personal information of its current or future Clients (potential clients), as well as of those Clients whose commercial relationship has concluded, with the object of sending them commercial information that, at the discretion of FUJIFILM COLOMBIA, may be of their interest; as well as to, among other aspects, invite them to events organized by FUJIFILM COLOMBIA; submit newsletters or publications and, in general, use the data for the execution of the activities under its company object.

The data collected by FUJIFILM COLOMBIA may, eventually, be shared with third parties or authorities exercising supervision and/or control, with the object of complying with the requirements of those entities.

The personal information of third parties, whose Controller is the Client, that FUJIFILM COLOMBIA must know due to or as a result of the provision of the services contracted by the Client, must have authorization from the owner, and said authorization must authorize the Client in terms of the Processing of the data by FUJIFILM COLOMBIA, and by virtue of the principle of Good Faith, it also assumes that the same has been Processed in strict adherence to the provisions of Law 1581 and Decree 1377 of 2013. In any case, the personal data of third parties whose Controller is the Client, shall be processed within the framework of the object of the services contracted by the Client, with the object of complying with the contractual relationship between FUJIFILM COLOMBIA and the Client.

FUJIFILM COLOMBIA, due to the events, trainings, or other activities carried out by these in pursuit of its company object, may save and take audios, videos, or photos of the Clients with respect of the execution of these events, data that may be used by FUJIFILM COLOMBIA in any activity carried out in pursuit of its company object.

The Processing of data gathered by virtue of the provisions herein, shall be carried out and remain valid while the object for which the respective data was collected is maintained.

b. On the Personal Data of Employees; Contractors; New Employees; Temporary Employees; Covid-19 Signs and Symptoms Report; Training Forms; Biometric Databases; General Symptom and Acute Respiratory Infection (ARI) Report

FUJIFILM COLOMBIA and/or the third party contracted by it for the performance of the activities related to the settlement and payment of the payroll (understood as “processor” and/or “controller”, according to the contractual provisions agreed in this respect), shall carry out the Processing of personal information of the employees of FUJIFILM COLOMBIA and their nuclear family, in order to comply with the obligations arising from the respective work relationships, such as payroll payments, granting of benefits, performance assessment, affiliation and payment to the comprehensive social security system, compensation funds, etc., as well as to comply with internal policies, among other aspects.

Furthermore, FUJIFILM COLOMBIA and/or the third party contracted by it for the performance of activities related to the recruitment of personnel (understood as “processor” and/or “controller”, according to the contractual provisions agreed in this respect), may gather personal information of candidates for selection purposes, in order to carry out the respective processes.

FUJIFILM COLOMBIA and/or the third party contracted by it for the performance of activities related to the recruitment of personnel, may indefinitely store the information of people in these processes, and use the same in selection processes of future personnel. In this respect, it is understood that people who submit their résumé for consideration, by any means, understand and authorize the Processing of their personal data under these terms.

The personal data and information obtained in the selection process related to the persons selected to work in FUJIFILM COLOMBIA, shall be stored in the personnel folder, applying high security levels and measures to this information, by virtue of the potential for said information to contain sensitive data. In this respect, FUJIFILM COLOMBIA shall store the personal data and personal information of employees in a folder identified with the name of each one of them, and this folder, which may be physical or digital, can only be accessed and processed by the Human Resources Area for the purpose of managing the contractual relationship between FUJIFILM COLOMBIA and the employee.

FUJIFILM COLOMBIA, due to the events, training sessions, or other activities carried out in pursuit of its activities, may record, and take audios, videos or photos of the employees, and this data may be used by FUJIFILM COLOMBIA in publications and, in general, in any activity of FUJIFILM COLOMBIA, even once the employee leaves FUJIFILM COLOMBIA and is considered a former employee.

Different use of the personal information and data of employees shall only be accepted by order from a competent authority, provided that the same contains said power. To this end, the Legal Area of FUJIFILM COLOMBIA shall be responsible for assessing the competence and efficacy of the order from the competent authority, in order to prevent an unauthorized assignment of the personal data.

Personal data and information obtained from the selection process, shall be stored in the personnel folder, applying high security levels and measures to said information, by virtue of the potential of said information containing sensitive data.

The Processing of data gathered by virtue of the provisions herein, shall be carried out and remain valid while the object for which the respective data was collected remains valid.

c. On the Personal Data of Former Employees

FUJIFILM COLOMBIA may indefinitely store the personal data of all Employees who ended their work relationship with FUJIFILM COLOMBIA. The object of this file shall be: (i) Serve as basis for the issuance of the work certifications under Article 57, section 7 of the Substantive Code of Labor, upon request from the Former Employee or its assignees; (ii) Serve as basis for the granting of work references to potential employers of the Former Employee, when the latter authorizes the same upon termination; and/or (iii) The information stored in this file may be assessed, analyzed, and used with the object of considering the Former Employee in the personnel recruitment processes carried out.

FUJIFILM COLOMBIA, due to the events, training sessions, or other activities carried out in pursuit of its activities, may record and take audios, videos, or photos of employees. This data may be used by FUJIFILM COLOMBIA in publications and, in general, in any activity of FUJIFILM COLOMBIA, even after the employee leaves FUJIFILM COLOMBIA and becomes a former employee.

FUJIFILM COLOMBIA shall store the personal data of Former Employees in a central archive, subjecting said information to high security levels and measures, by virtue of the potential for said work-related information to contain sensitive data.

FUJIFILM COLOMBIA cannot assign this information to third parties, as it may cause a deviation from the object for which the personal data was given by its owners, unless there is prior and written authorization documenting the consent of the owner of the personal data in this respect.

The Processing of data gathered by virtue of the provisions herein shall be carried out and remain valid while the object for which the respective data was collected remains valid.

d. On the Personal Data of Visitors:

FUJIFILM COLOMBIA shall carry out the processing of personal information of individuals visiting its facilities, in order to safeguard their security, the security of its facilities, and the security of its collaborators and other individuals within its offices. In pursuit of this goal, it may gather data such as videos, photos, biometric data, identification data, among others. The Processing of the data gathered by virtue of the provisions herein, shall be carried out and remain in force as long as the object for which the respective data was gathered, remains valid.

XII. RIGHTS OF PERSONAL DATA OWNERS

Owners, or their duly accredited assigns in accordance with the Law, shall have the following rights with respect to their personal data:

1. The right to obtain all the information related to: (i) their own personal data, whether partial or full, (ii) the processing applied to the same, (iii) the purpose of the processing, (iv) the location of the databases containing their personal data, (v) and the communications and/or assignments carried out with respect to them, whether authorized or not. To this end, they may check, upon a free written request, their data included in any database for which FUJIFILM COLOMBIA is the Controller.

2. The right to update or modify their personal data when the same is subject to any variation, or when the information is incomplete, inaccurate, or nonexistent.
3. The right to cancel their personal data or delete them when the same is excessive, irrelevant, or when the processing is contrary to the norms, except in the cases considered exceptions by Law.
4. The right to revoke the consent or the authorization given to FUJIFILM COLOMBIA to carry out the processing with a specific purpose, except in the cases considered exceptions by Law and/or those where the same is required under a specific legal or contractual framework.

5. The right to oppose the processing of their personal data, except in the cases where said right is not applicable due to a legal provision or because the same infringes general interests prevailing over individual interests. In this respect, FUJIFILM COLOMBIA shall review, from a legal point of view, the arguments stated by the owner, in order to determine if the general interest prevails over the individual interest or, on the contrary, if the individual right of the data owner prevails.
6. The right to submit before FUJIFILM COLOMBIA, through the channels made available to this end and mentioned in this Manual, as well as before the Superintendence of Industry and Commerce or the competent entity; requests, complaints and claims, as well as to file all actions deemed appropriate to protect their data.
7. The right to submit a complaint before the Superintendence of Industry and Commerce, when it believes that this Manual, or the current regulations on personal data protection, has been breached.
8. The right to grant its authorization by any means that may be subject to future consultation, so that FUJIFILM COLOMBIA may process their personal data. Even though this authorization will not be required in the following cases, the processing thereof must be done in compliance with the principles and provisions established in the current regulations for the purpose of personal data protection:
 - a. When the information is required by a public or administrative entity in compliance with its legal functions, or by a court order.
 - b. For public data.
 - c. In case of medical or health emergencies.
 - d. When the processing of the information is authorized by Law for historic, statistical, or scientific purposes.
 - e. For personal data related to the Civil Registry of Individuals.
9. The right to request evidence of the acceptance given for the processing of their personal data from FUJIFILM COLOMBIA, except for the cases in which the Law excludes the attainment of Authorization from the Owner, or in the cases in which the gathering of the data occurred prior to June 27, 2013. The provisions under this Manual must be followed for data gathered prior to the issue date of Decree 1377 of June 27, 2013.

XIII. PROCEDURES

A. PROCEDURES THAT MUST BE CARRIED OUT BY DATA OWNERS TO EXERCISE RIGHTS RELATED TO THEIR PERSONAL DATA:

i. For consultations and/or Queries:

When the owner or its assignee want to submit consultations related to the personal data included in any database in possession of FUJIFILM COLOMBIA, it shall submit a written request to the address and/or email mentioned above, including all the information related to the identification of the owner of said data. The same applies when said consultation is intended to raise queries regarding the content of this manual and/or on the Processing FUJIFILM COLOMBIA has given to its data. In the event the request is carried out through physical mail, the Owner must indicate the address it wants to receive the response at.

The request must be accompanied by the current address to which it wants the information to be submitted to, its identification number, a copy of its National, Foreigner ID Document, or Passport, which must also be signed by the owner of the personal data. This documentation may be submitted in physical or digital means. In the event the owner is represented by a third party, it shall provide the respective power of representation with signature recognition before a Notary Public. In these cases, the representative must also attach a copy of its identity document, as mentioned above.

The request must contain the adequate and exact petition of information, which must be duly substantiated and with the supporting documents attached to it.

If any of the requirements above is missing, the Processing Area shall notify this event to the concerned party within five (5) days after receiving the request, so that this situation can be remedied. The request will be answered once this procedure is carried out. The request shall be deemed withdrawn two (2) months after the request, if the same is not replied to.

Once the respective communication is received, the Processing Area, for one single query, shall have a deadline of ten (10) business days to provide an answer. When the query cannot be responded to within this period, the concerned party shall be notified of this event, expressing the reasons for the delay and indicating the date in which its query will be attended, which under no circumstance can exceed five (5) business days after the expiry of the first period.

The periods mentioned above for queries shall start on the date the query was received, and the date following its receipt date in case of claims.

The Processing Area will submit the respective answer to the email address from which the query and/or claim was received, or to the address indicated in the request. All requests without physical or electronic addresses for answering purposes will not be assessed and will be discarded.

Within two (2) business days after the **complete** receipt of the request, the Processing Area will indicate that it is an ongoing query, and the respective database of Requests, Queries and/or Claims (*PQR*) shall contain a box stating the following: “Ongoing query” and “Resolved query”, in order to register the updated status of the same, as applicable.

When FUJIFILM COLOMBIA holds the capacity of Processor, it shall notify this situation to the owner or the person concerned of the personal data, as well as notifying the petition to the personal data controller, so that the latter can respond to the request for the submitted query. A copy of this communication must be addressed to the owner of the data or the concerned party, so that it is aware of the identity of the personal data controller, thus, the main responsible for ensuring the exercise of its rights and receiving a timely response to its petition.

FUJIFILM COLOMBIA shall document and store petitions made by owners of data or by concerned parties, in pursuit of any of the rights, as well as the responses to those petitions. This information shall be processed in accordance with the correspondence and document management policy of FUJIFILM COLOMBIA.

ii. For Claims:

The Owner of assignee can only file complaints before the Superintendence of Industry and Commerce after exhausting the query or claim proceeding before the Controller or Processor.

When the Owner or its assignees request correction, update and/or deletion of their data from the database with FUJIFILM COLOMBIA as Controller, they shall submit a written petition to the address and/or email address mentioned above, which shall contain, in accordance with Article 15 of Law 1581 of 2012, the identification of the Owner, the description of the events that caused the claim, the address for receiving responses or notifications, and the documents that support or back the petition; which must include a copy of the National, Foreigner ID Document, or passport annexed therein.

The petition must be accompanied by a copy of the National, Foreigner ID Document, or passport, and must be signed by the owner of the personal data. This documentation may be provided in physical or digital media. When the owner is represented by a third party, it shall provide the respective power of attorney with signature recognition before a Notary Public. In these cases, the representative must also attach a copy of its identification document, as mentioned above.

The request must contain the specific and exact petition of information, access, update, correction, cancellation, opposition, or revocation of consent and, in each case, the same shall be well founded.

When the petition pertains to an update or correction of information, the Owner shall state that the new information submitted to FUJIFILM COLOMBIA is true.

If any of the requirements above is missing, the Processing Area shall notify the concerned party within five (5) days after receiving the request, so that this situation can be remedied. Once this procedure is completed. The request will be answered once this procedure is carried out. The request shall be deemed withdrawn two (2) months after the request, if the same is not replied to.

Once the respective communication is received, the Processing Area, for one single query, shall have a deadline of fifteen (15) business days to provide an answer. When the query cannot be responded to within this period, the concerned party shall be notified of this event, expressing the reasons for the delay, and indicating the date in which the same be attended, which cannot exceed eight (8) business days after the expiry of the first period.

The aforementioned periods for claims shall start the day after the date the same are received.

The Processing Area shall submit the respective response to the email from which the query and/or claim was forwarded, or to the address indicated in the document. All documents without physical or electronic address for response purposes will not be assessed and will be discarded.

Within two (2) business days after the **complete** receipt of the request, the Processing Area will indicate that it is an ongoing query, and the respective database of Requests, Queries and/or Claims (*PQR*) shall contain a box stating the following: “Ongoing query” and “Resolved query”, in order to register the updated status of the same, as applicable.

For all purposes, the provisions under Article 15 of Law 1581 of 2012 shall apply for matters not established herein.

When FUJIFILM COLOMBIA holds the capacity of Processor, it shall notify this situation to the owner or the person concerned of the personal data, as well as notifying the petition to the personal data controller, so that the latter can respond to the request for the submitted query. A copy of this communication must be addressed to the owner of the data or the concerned party, so that it is aware of the identity of the personal data controller, thus, the main responsible for ensuring the exercise of its rights and receiving a timely response to its petition.

FUJIFILM COLOMBIA shall document and store petitions made by owners of data or by concerned parties, in pursuit of any of the rights, as well as the responses to those petitions. This information shall be processed in accordance with the correspondence and document management policy of FUJIFILM COLOMBIA.

B. INFORMATION SECURITY

FUJIFILM COLOMBIA is committed to protect its users and ourselves from unauthorized access or any modification, dissemination, or unauthorized elimination of the information in our possession.

The transmission of data via Internet or through any wireless network cannot guarantee that the same is 100% secure; therefore, they assume and acknowledge that its use generates a potential risk for breach. Nevertheless, we have security and access protocols for our information, storage, and processing systems.

As a result of this, even though we try to protect your personal information, we cannot guarantee or ensure the security of any information you transmit to FUJIFILM COLOMBIA; therefore, you do this transmission at your own risk. Particularly in this respect:

- We have controls on our information systems that allow us to maintain a better quality of your information.
- We check our information compiling, storage, and processing policies, including our physical security measures, to protect us against unauthorized access to the systems.
- FUJIFILM COLOMBIA has deployed a series of internal procedures to ensure the adequate operation of technical security schemes. However, FUJIFILM COLOMBIA is not liable for any consequence derived from undue or fraudulent access to databases by third parties and/or any technical flaw during storage.
- We restrict access to the personal information in our possession related to our clients and/or users for employees and contractors that need said information to process the same for us. These employees and contractors are also subject to strict contractual confidentiality obligations and may be penalized or fired if they breach these obligations.

SECURITY MEASURES. In pursuit of the security principle established in Law 1581 of 2012, FUJIFILM COLOMBIA shall adopt the technical, human, and administrative measures necessary to give security to records, avoiding their adulteration, loss, consultation, use, or fraudulent or unauthorized access.

IMPLEMENTATION OF SECURITY MEASURES. FUJIFILM COLOMBIA shall maintain mandatory security protocols for the personnel with access to personal data and to information systems.

The processing must take into account the following aspects, as a minimum:

- a) Scope of application of the procedure, with detailed specification of protected resources.

- b) Measures, norms, procedures, rules, and standards aimed towards ensuring the security level demanded under Law 1581 of 2012
- c) Functions and obligations of the staff.
- d) Structure of personal data base and description of the information systems processing them.
- e) Incident notification, management, and response procedure.
- f) Backup copy and data recovery procedures.
- g) Regular controls required to verify compliance with the provisions under the security procedure implemented.
- h) Measures to be adopted when a support or document is to be transported, removed, or reused.
- i) The procedure must be kept up to date at all times and must be reviewed every time relevant changes occur in the information system or in its organization.
- j) The content of the procedure must be adapted at all times to the current provisions on personal data security.

STORAGE OF YOUR PERSONAL DATA. The personal data of all our clients and/or users shall be stored in a database behind a firewall for added security. The server that contains the database is physically protected at a secure location. Only authorized personnel can access this server, thus access the personal data of our clients and/or users.

C. PROCEDURE FOR THE PREPARATION AND COMPLETION OF THE PERSONAL DATA CENTRAL REGISTER:

FUJIFILM COLOMBIA, with respect to the personal data under its custody, especially in its capacity as controller of said data and not as processor thereof, when applicable, shall have a Personal Data Central Register in the regular course of its businesses, in which it will list each one of the databases in its information systems.

The Processing Area of FUJIFILM COLOMBIA must do the following in this register:

1. Register all the personal data bases in its information systems and assign them a record number.
2. Indicate the following during this registration: (i) The type of personal data it contains; (ii) The object and intended use of the database; (iii) Identification of the area doing the database processing; (iv) Method of processing employed in the database (automated or manual); (v) Security level and measures applied to the database by virtue of the personal data type it contains; (vi) Location of the database; (vii) Condition of FUJIFILM COLOMBIA with respect to the database, whether CONTROLLER or PROCESSOR; (viii) Status of Authorization by the Owners of the personal data in the database, Origin of the data and procedure for the attainment of the consent; (ix) Database communication or assignment authorization, if any; (x) Situation of Transfer or Transmission of Personal Data (national or international); (xi) Official who maintains custody of the database; (xii) Queries and/or Claims on the personal data included in the database and their corresponding updated status; (xiii) Changes made to the personal data base with respect to the information mentioned in this subsection. If the databases have not suffered any changes, this situation shall be recorded.
3. Registering and documenting the events and record of security incidents occurring against any of the personal data bases in custody of FUJIFILM COLOMBIA.
4. Indicating the penalties imposed for the use of the personal data base, indicating their origin.
5. Registering the cancellation of personal data base, indicating the reasons and the technical measures adopted to that end.

D. PROCEDURE TO HANDOVER PERSONAL DATA TO COMPETENT AUTHORITIES:

In the event entities of the State or competent authorities request access and/or handover of personal data included in any of the databases of FUJIFILM COLOMBIA, the Processing Area shall carry out the following procedure:

1. Verify the legality of the petition.
2. Verify the relevance of the data requested by the Entity, with respect to the objective expressed by the competent authority.
3. Document the handover of the personal information requested, ensuring that the same is compliant with all its attributes (authenticity, reliability, and completeness), notifying the duty that entity has with respect to the protection of that data, clearly explaining that this obligation falls on the official making the request and on the person receiving the same, as well as the entity they work for.

4. Notifying the competent authority requiring the personal data about the security measures applied on the personal data submitted, as well as the risks generated by their undue use and undue processing.

XIV. DUTIES OF PERSONAL DATA CONTROLLERS AND/OR PROCESSORS:

a. Duties of Controllers:

Without prejudice to the provisions established by Law, the duties required from Controllers are as follows:

1. Notifying the Owner about the object of the collection of its personal data, and their rights by virtue of the authorization granted to FUJIFILM COLOMBIA for the corresponding processing.
2. Ensuring the full and effective exercise of the Habeas Data right to the Owner, as well as all the rights mentioned in this Manual and in the current applicable law.
3. Maintaining the information under the security conditions required to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent use.
4. Request and maintain, in the conditions established in this Manual and in the Law, a copy of the respective authorization granted by the Owner.
5. Ensure that the information provided to the Processor is accurate, complete, exact, updated, verifiable, and comprehensible.
6. Updating the information by means of a timely notification to the Processor, about updates related to the data previously provided to it, and adopting the measures required for the information provided to remain up to date.
7. Rectifying information when the same is inaccurate, and communicate relevant aspects to the Processor.
8. Provide only data previously authorized for processing by the owner to the Processor, in accordance with the law.

9. Demanding compliance with the security and privacy conditions of the Owner's information from the Processor, at least for the same issued by FUJIFILM COLOMBIA as Controller.
10. Processing queries and claims filed under the terms in this Manual and in the Law.
11. Adopting an internal manual of policies and procedures to ensure due compliance with the law with respect to personal data protection and to respond to queries and claims.
12. Notify the Processor in the event certain information is in discussion by the owner once a claim is submitted and the respective procedure is not complete.
13. Notifying the owner about the use of its personal data, upon request.
14. Notifying the personal data protection authority whenever the security codes or policies are breached, and when it considers that there are risks in the management of the data of owners.
15. Complying with the instructions and requirements issued by the Superintendence of Industry and Commerce.

b. Duties of Data Processors:

Without prejudice to all other provisions established by law, the duties to be fulfilled by Processors are as follows:

1. Guaranteeing to the Owner, its full and effective exercise of the Habeas Data right, as well as all other rights established under this Manual and enshrined in the current applicable law.
2. Maintaining the information under the security conditions required to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access.
3. Perform a timely update, rectification, or deletion of personal data in accordance with the Law.
4. Update information reported by data controllers within five (5) business days, after receiving the same.
5. Processing queries and claims filed by owners, within the terms established in this Manual and in the Law.
6. Adopting an internal procedure and policy manual to ensure adequate compliance with the law with respect to the protection of personal data and to respond to queries and claims.
7. In the event of ongoing claims, label the database with "ongoing claim", in accordance with the law, with respect to those complaints or claims that have not been resolved and were submitted by the owners of the personal data.
8. When applicable, label the database as "information in legal dispute", for cases where legal proceedings related to the quality of the personal data are notified by a competent authority.

9. Refrain from circulating information disputed by the owner, subject to blocking ordered by the Superintendence of Industry and Commerce.
10. Allowing access to information only to individuals who are entitled to it.
11. Informing the personal data protection authority when infringements to security codes or policies occur, and when there are risks in the management of the data of owners.
12. Complying with the instructions and requirements issued by the Superintendence of Industry and Commerce.

c. Joint Duties of Controllers and Processors:

Without prejudice to all other provisions established by Law, the following are the duties that must be jointly complied with by Controllers and Processors:

1. Regulating access to databases personal data bases in contracts with employees, collaborators, suppliers, clients, and/or third parties.
2. Maintaining a full register of the databases with personal data, including the historic record from their creation, processing of information, to the cancellation of databases.
3. Managing the access, management, use, and/or processing of personal data bases under its custody, in which FUJIFILM COLOMBIA acts as controller or processor in a secure fashion.
4. Applying sufficient security measures to safeguard the personal data under its custody, and implementing adequate information security policies, such as the implementation of disaster recovery procedures applicable to the database containing personal data, the implementation of Backup procedures of databases containing personal data, or having a procedure available to manage security incidents related to databases containing personal data, among others.
5. Having a technology infrastructure that reasonably protects personal data under its custody, restricting access to third parties as much as possible, and endeavoring to improve the security standards that protect collected personal information.
6. Periodically auditing compliance with the content of this Manual by its intended recipients.

XV. COMMUNICATION AND/OR ASSIGNMENT OF PERSONAL DATA AND PROCESSING OF PERSONAL DATA OF CHILDREN AND ADOLESCENTS

As a rule of thumb, the assignment, communication, or circulation of personal data is prohibited without prior, written, and express consent from the owner of the data, and without authorization from the Processing Area of FUJIFILM COLOMBIA. When authorized, said assignment or communication of personal data shall be registered in the Personal Data Central Register.

The processing of personal data of children and minor adolescents is prohibited, unless there is express authorization from their legal tutors, or with respect to public data, when the processing responds to and obeys the interests and rights of the minor. All processing that may be carried out with respect to the data of minors, shall safeguard the prevailing rights recognized for them under the Political Constitution, in accordance with the Code of Children and Adolescents.

XVI. INTERNATIONAL TRANSFER AND/OR TRANSMISSION OF DATABASES

FUJIFILM COLOMBIA will not allow the transfer of personal data to countries not compliant with Personal Data Protection standards and that do not provide adequate protection levels for the same, in accordance with the Superintendence of Industry and Commerce, except for the cases detailed below:

1. When the owner of the data granted its prior, express, and unequivocal authorization for the transfer.
2. When the transfer is necessary to perform a contract between the owner and FUJIFILM COLOMBIA, as controller and/or processor, or for the execution of pre-contractual measures, provided that there is authorization from the Owner;
3. For bank and exchange transfers in accordance with the law applicable to those transactions;
4. For data transfers within the framework of international treaties Colombia is part of, in accordance with the principle of reciprocity;
5. For the exchange of medical data, when required for the processing by the Owner due to public health or hygiene purposes;
6. For transfers legally required to safeguard a public interest or to recognize, exercise, or defend a right in a judicial process.

When an international transfer of personal data occurs, after delivering and receiving the same, FUJIFILM COLOMBIA shall sign the agreements or contracts that regulate in detail the obligations, burdens, and duties arising for the intervening parties, especially in the following aspects:

1. Scope of processing by the Processor
2. Activities that the Processor shall carry out on behalf of the Controller for Personal Data processing purposes.
3. The commitment by the Processor to comply with this Manual.
4. Being bound to provide processing on behalf of the Controller for personal data purposes, in accordance with the principles established in the current legislation and the rights and duties enshrined in this Manual and the law.
5. Being bound to safeguard the security of the databases that contain personal data, with the same measures adopted by FUJIFILM COLOMBIA, as a minimum.
6. Being bound to maintain the confidentiality of the processing of personal data.
7. Adhering and being bound to strictly comply with this Manual and the Colombian norms in terms of Personal Data protection. (This obligation must be extended to its officials, collaborators, suppliers, and any third party that may participate in the processing).
8. Being obliged to carry out the Internal Audits required to verify compliance with this Manual.
9. Including technological or physical security measures that will be implemented on the channels by means of which the data transmission will be carried out.
10. Including the objects authorized by the owner of the data to the Controller, so that the Processor only processes the data until authorized by said purpose.
11. Including the safety measures to be adopted by the Processor on the information, to prevent its access, adulteration, unauthorized or fraudulent deletion, as well as to prevent leakage of information.
12. Including the channels established for owners to exercise their rights before the Processor.
13. Including the measures to be adopted on the information subject to communication, once concluded the execution of the contract, whether by elimination or return to the Processor.
14. Detailing responsibilities due to noncompliance with the contract with respect to the management of the personal information, taking into account that the materialization of any risk on this data, such as leakage, modification, or unauthorized access, among others, may generate economic, administrative, and even criminal sanctions.
15. Including the mechanisms by means of which the Processor will periodically report to the Controller all security incidents occurring on the personal data.

16. Detailing the training plans at the disposal of the Processor to train its officials in terms of complying with norms related to Personal Data Protection, particularly on the current norms in terms of the Colombian Legal System and this Manual.

The agreements or contracts signed must obey the provisions in this norm, as well as the applicable legislation and jurisprudence in terms of personal data protection.

The Processing Area shall be responsible for approving the agreements or contracts that involve an international transmission of personal data, responding to the guidelines established in this Manual and in the current regulations on the subject, as well as to make all relevant inquiries to the Superintendence of Industry and Commerce in order to ensure the circumstance of a “secure country” with respect to the territory of destination and/or origin of the data subject to transfer.

I. MANUAL REVISION PROCESS

FUJIFILM COLOMBIA may modify this Manual whenever it deems it appropriate, and if any change or modification thereof is carried out, this circumstance may be evidenced in the section “Change Control” at the end of this document. Due to this, FUJIFILM COLOMBIA invites all concerned parties to periodically check and review this Manual, with the object of staying informed with respect to its updates.

If a change in the object of the personal data processing occurs, FUJIFILM COLOMBIA shall request a new authorization from the owners affected by said change. Any material change to this Manual will also be notified to the owners.

The content of this manual shall be permanently reviewed and updated by those responsible for it, as shown below:

<u>Official</u>	<u>Responsibility</u>
General Manager and/or Legal Representative	Authorizing the manual and changes or subsequent updates thereof.
Personal Data Protection Officer	<p>Authorizing changes to the manual not deemed substantial, prepare the update project to forward those proposals for approval of General Management and/or the Legal Representation.</p> <p>Reviewing the manual compliance index at least once per year, and proposing improvements and changes.</p> <p>Responsible for the compliance with the manual and its permanent revision, to propose the respective improvements, changes, and adjustments.</p>

II. CHANGE CONTROL

No changes to the policy have been made.

III. SIGNATURES AND AUTHORIZATIONS

When you sign and approve this document, you are also approving its distribution in the following means of distribution: printed, email, website, etc.

VALIDITY. This manual replaces the existing one, effective until March 18, 2021, and shall become effective from March 19, 2021 onwards.

TAKUYA MAEDA
Legal Representative