

Privacy Policy

Authorization for the handling of personal data and internal **Manual** of policies and procedures to guarantee the treatment of personal data.



This document is made of two sections: Authorization for the Processing of Personal Data at Brain Hunter and THT. Data Handling Policy Manual.

April de 2023

THT THE TALENT SYSTEM S.A.S.

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Web Page: <https://tht.company>

We are a multinational human talent company with presence in thirteen countries, which offers a practical methodology for selection, development and alignment of people in organizations; supported by a strong platform which offers 300 tools with unlimited access.

THHT

Authorization to THT to Process Personal Data.

I hereby authorize THT - The Talent System S.A.S., hereinafter THT, in compliance with the laws of data processing so that through this document may: collect, store, use and other prerogatives set forth in its Privacy Policy.

THT guarantees that its mechanisms and tools for the processing of your personal data are completely confidential and the storage of these is done with high security preventing access to unauthorized third parties and their disclosure.

THT will use your personal data for the following purposes:



Your Personal Data will be included in one or more databases and may be transmitted and/or transferred among THT, its related subordinates, its parent or controlling company, the subordinates of its parent or controlling company, (hereinafter "Authorized Entities"), so that directly or through third parties, they may process the Personal Data in accordance with the purposes set forth in this notice. Likewise, THT's databases may include and integrate data transmitted and/or transferred to it by the Authorized Entities and/or third parties.



To carry out the relevant actions for the development of the company's corporate purpose in relation to the fulfillment of the purpose of the contract entered into with the Data Subject.



Make invitations to events.



Offer new products and services.



Manage procedures (requests, complaints, claims).



Conduct satisfaction surveys regarding the goods and services offered by THT.



Inform about changes in our products or services or about new ones related to the product(s) or service(s) contracted or purchased.



Deliver and offer to the Subject in a general or segmented way, information, content and/or advertising of THT, the Authorized Entities and/or third parties, and qualify the tendency and/or affinity to products or services of THT and/or the Authorized Entities and/or third parties to perform segmentation or profiling of users.



Elaborate and report statistical information, satisfaction surveys, market or consumer studies and analysis, including the possibility of being contacted for such purposes by THT and/or the Authorized Entities.



Identify, collect and associate to the data, information about the holder's browsing preferences in THT's and/or Authorized Entities' portals, as well as geo-referencing and/or specific location data generated by mobile devices, in order to improve the user's experience, know the user's browsing profile, deliver information and/or segmented advertising about products and/or services of THT or third parties, qualify the tendency and/or affinity to THT's and/or Authorized Entities' and/or third parties' products or services. For further details, see Browsing Data Policy - "Cookies".



Identify, collect and associate data, information about your purchasing habits or interests and share them with The Authorized Entities and/or third parties, such as: attendance to public or private events of THT and/or The Authorized Entities; redemption or use of promotions to which you have had access for being a customer of THT and/or The Authorized Entities; the use of social networks, where you follow or are followed, or have generated an interaction with THT and/or The Authorized Entities.



Transmit them, within or outside the national territory (regardless of the country of destination), to third parties that act as data processors and that provide THT and/or The Authorized Entities with technological, logistical, administrative, distribution, e-mail marketing, contact center and/or any other service required by THT and/or The Authorized Entities, for the development of the activities contemplated in the purposes set forth in this Privacy Notice and always subject to THT's Privacy Policies.



Provide contact information to the sales force and/or distribution network, telemarketing, market research and any third party with which THT has a contractual relationship for the development of such activities (market research and telemarketing, etc.) for the execution of the same.



Contact the Data Subject by telephone to carry out surveys, studies and/or confirmation of personal data necessary for the execution of a contractual relationship.



Contacting the Data Subject through electronic means - SMS or chat to send news related with loyalty campaigns or service improvement.



Contacting the Data Subject via email to send bank statements, account statements or invoices in relation to obligations arising from the contract entered into between the parties.



Notification of job vacancies and data to know my professional profile.



To receive information regarding Talentracker to enhance my professional profile.



I declare that I have been informed that in case of collection of my sensitive information, I have the right to answer or not the questions asked and to deliver or not the requested data.



I declare that I have been informed that in case of collection of information from minors in my care, I have the right to answer or not to answer the questions that I am asked and to deliver or not the requested data.



I understand that sensitive data are those that affect the privacy of the Data Subject or whose improper use may generate discrimination. Use examples of sensitive data.



I declare that I have been informed that the sensitive data that will be collected will be used for the purposes listed in this document.



Access free of charge to the data provided and not processed that have been subject to processing.



Request the updating and rectification of your information in case of partial, inaccurate, incomplete, fractioned, misleading data, or data whose processing is prohibited or has not been authorized.



Request proof of the authorization granted.



File complaints with the relevant authority for violations of the provisions of the regulations in force.



To revoke the authorization and/or request the deletion of the data, unless there is a legal or contractual duty that makes it imperative to keep the information.



Refrain from answering questions about sensitive data or data of children and adolescents.

These rights may be exercised through the channels or means provided by THT for customer service, only through the email pqrs@brainhunter.co, whose information can be found at www.brainhunter.co, for the attention of requirements related to the processing of my personal data and the exercise of the rights mentioned in this authorization.

For all the above, I have given my consent to THT to process my personal information in accordance with the Privacy Policy provided by the company on its website in accordance with current legislation, which complies with the standards of Personal Data Protection worldwide, and that I was made aware of all the terms before collecting my personal data.

I declare that the present authorization was requested and presented to me before submitting my data and that I freely and voluntarily sign it once I have read it in its entirety.

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The Personal Data Protection Law recognizes and protects the right of all persons to know, update and rectify the information that has been collected about them in databases or files that are susceptible of being processed by public or private entities.

I. Introduction

The guidelines and regulations defined under the laws issued indicate the process that must be made of the personal information of anyone who has a relationship with the companies, whether customer, supplier or employee of the same, for compliance with laws and regulatory decrees, this document is established, which provides for the handling of requests for acceptance, inquiries and complaints related to the processing of this type of information.

II. Objective

This document establishes the Privacy Policy for the Treatment of Personal Data for the company THT THE TALENT SYSTEM S.A.S.

This document has been prepared in accordance with the guidelines set forth in the applicable regulations in force on the matter and shall be applicable to all databases where personal information is stored and which are subject to processing by THT THE TALENT SYSTEM S.A.S. (hereinafter referred to as THT o THE COMPANY).

III. Scope

These policies apply to the processing of personal information of all those who have a relationship with THE COMPANY, whether they are third parties (including customers and suppliers) or employees of the same, in accordance with the provisions of the law.

IV. Applicable Regulations

The most important aspects to take into account according to data protection laws are: Privacy Act of 1974 and other norms that modify, add or complement them which must be applied in THT THE TALENT SYSTEM S.A.S.

NOTA: To the extent that decree(s) that incorporate changes that modify the aforementioned laws, this Manual will be adjusted according to the changes.

V. Content of the internal manual of policies and procedures for the processing of personal data

1. General data of THT THE TALENT SYSTEM S.A.S. as data controller
2. Objectives of the Privacy Policy
3. To whom the Privacy Policy is addressed
4. Scope of application
5. Important definitions in data processing
6. Guiding principles for the processing of personal data
7. Data Bases
8. Holder's authorization for data processing
9. Holder's authorization for the processing of sensitive data.
10. Use and purpose of the processing of personal data
11. Privacy notice
12. Revocation of authorization and/or deletion of the Data
13. Rights of data subjects.
14. Procedure for the exercise of rights as owner of the data.
15. THT THE TALENT SYSTEM S.A.S.'s duties as data controller.
16. Security Measures applied to the processing of databases.
17. Unit in charge of the procedure for the data subject for exercising their rights of petitions, queries and claims.
18. Modification of the privacy policy
19. Entry into force of the privacy policy

VI. Personal data processing policies

1. General information THT THE TALENT SYSTEM S.A.S. as responsible/controller for the processing of Personal Data

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2. Objectives of the Privacy Policy Manual

The purpose of this document is to protect the right that all persons have to know, update and rectify the information that has been collected about them in the databases or files owned by THT THE TALENT SYSTEM S.A.S., or whose treatment has been entrusted to THT THE TALENT SYSTEM S.A.S., in development and compliance with its corporate purpose, as well as the other rights, freedoms and guarantees indicated in the regulations in force.

In this document, you will find the legal and corporate guidelines under which THT THE TALENT SYSTEM S.A.S., performs the processing of your data, the purpose, your rights as owner, as well as the internal and external procedures that exist for the exercise of such rights before THT THE TALENT SYSTEM S.A.S.

THT THE TALENT SYSTEM S.A.S. understands by data protection all those measures taken at a physical, technical and legal level to guarantee that the information of the Data Subjects - natural persons - (clients, former employees, suppliers, creditors, etc., of THT THE TALENT SYSTEM S.A.S.) registered in the database of THE COMPANY, is safe from any attack or attempt to access it by unauthorized persons, as well as that its use and conservation is adequate to the Purpose established for the collection of the Personal Data.

This Manual aims to comply with current legislation on data protection, especially the Privacy Act of 1974 and other rules that modify, add, supplement or develop).

3. To whom the privacy policy is addressed?

This Privacy Policy is addressed to all natural persons who have or have had any relationship with THT THE TALENT SYSTEM S.A.S., namely, suppliers, employees, former employees, current and potential customers, both active and inactive or any third party whose Personal Data is included in the THT THE TALENT SYSTEM S.A.S. databases.

4. Scope of application

The scope of application of this Manual, in accordance with the aforementioned legislation, shall be the data of natural persons registered in all the databases owned by THT THE TALENT SYSTEM S.A.S. or whose processing has been entrusted to them.

This document shall apply to the processing of personal data carried out in the territory or when THT THE TALENT SYSTEM S.A.S., in its capacity as Data Controller or Data Processor, ceases to be domiciled in the national territory.

5. Databases

5.1. Databases in which the company THT THE TALENT SYSTEM S.A.S. acts as controller and processors:

In the Treatment of the data contained in the following Databases, the company THT THE TALENT SYSTEM S.A.S. acts both as “ **Controller** ”, since they are the ones who collect the information and make the decisions on the Processing of the data, and as “ **Responsible** ”, insofar as they are the ones who carry out the Processing of the data.

The following are the 4 databases on which THT THE TALENT SYSTEM S.A.S. processes personal information:

5.1.1. Databases of current customers:

Description

Although the main customers are legal entities that hire the services of THE COMPANY in human talent consulting, this database collects information from individuals who hire the services of THE COMPANY. Thus, this database corresponds to those natural persons who acquire business consulting services for the development of tools in the area of human resources, the marketing of services and products for the improvement of organizational competencies and other services provided by THE COMPANY in the development of its corporate purpose.

This database also includes information of some natural persons who enter the page [http://tht. company/](http://tht.company/) and provide their data authorizing THT to process their data. The foregoing notwithstanding the fact that in most of these cases.

THT acts as the person in charge of this data, since it has signed service agreements with its clients for human talent consulting.

This database is managed by the Services Area, the Commercial Area, the Technology Area and the Administration Area.

Content

This database contains the following personal information: Name, Identification Number, address, Department (state), City (municipality), country, region, Address, Contact, Position, E-mail, Mobile Phone and Landline Phone, test results and contacts.

This database also includes the information of certified persons who are professionals in the area of psychology of clients who have provided the following personal data: Name, mail, date of birth, ID, company, position, cell phone, phone, Skype ID, WhatsApp ID, habeas data authorization to send information of interest, date, signature.

How data is collected

Customer information is obtained from the service agreements that are made with the customer once they buy or directly from them. The information on certified persons is obtained during training sessions by filling out the forms.

Data capture is done by means of questionnaires for people, positions and teams.

Purpose

The information contained in this database is intended to allow THE COMPANY to provide its advisory services in human talent, business consulting for the development of methodologies in human resources, services for the improvement of organizational skills and other similar activities provided by THE COMPANY.

The purpose of this database is to keep a control of the clients handled by THT and their respective contact information, and to have a record of the clients' contact information, and their respective contact information and to have a record of customers who have access to the service offered by THT.

The customer database is also intended to send them news and content related to the services provided by THT. On the other hand, the information of certified persons is intended to include them in THT's monthly newsletters..

Processing

The personal information contained in this database is subject to collection, customer approval, storage, use, frame working in the platform, internal circulation, transfer to the CRM and deletion of data.

The information contained in this database is stored in an Excel file, in Zoho CRM, physical and in the THT platform. It is important to note that the information stored in the system and on the company's servers has limited access. The information of certified persons is stored in physical form in AZ, at THT's offices.

The information is processed according to the different modules and algorithms designed, standardized, and validated by THT.

The information is stored in the Data Center contracted with THT, which allows consultation of the information through controlled access by means of passwords duly validated and updated by the COMPANY's clients.

Regarding security measures, THE COMPANY has implemented restrictions in the creation, manipulation and visualization of data. THT makes daily copies of the information, performs maintenance to its computer equipment, provides specialized training to its team of engineers and legally safeguards the control over the data.

Likewise, THT's client organizations have the option of periodically changing their passwords according to their security policy. On the other hand, the requested access tests have an expiration time so that, if a person requests a test and a certain period of time passes without applying them, they will not be able to complete them without first having been tested.

It is important to note that the information may be deleted at the request of the owner. For the deletion of data, the informed consent of the natural person who applied the data must be obtained and the client organization from where the person accessed the THT platform must be informed.

Likewise, THE COMPANY has established policies of confidentiality commitment of workers for data processing. Finally, it is important to note that this database complies with the general purposes set forth in section 10 of this Manual.

Validity

The personal information contained in this database is kept for the duration of the business relationship with the client plus an additional period of 10 years. It is important to highlight that this database is complemented with the filing policies of THE COMPANY.

5.1.2. Base de datos de clientes potenciales:

Database of potential customers:

This database corresponds to the information of potential clients of THE COMPANY. Therefore, this database corresponds to those people interested in hiring THT's business consulting services for the development of tools and methodologies in the area of human resources.

This database is managed by the Services Area, the Commercial Area, the Technology Area and the Administration Area.

Content

This database contains the following personal information: Name, Identification Number, address Department (state), City (municipality), Address, country, region, Contact, Position, E-mail, Mobile Phone and Landline Phone and contacts.

How data is collected

Customer information is obtained through the following means: telephone, various forms, visits and web forms.

Purpose

The information contained in this database is intended to get more customers, as well as marketing and sales campaigns, advertising services, sending legal and regulatory updates, invitations to events and scheduling business visits. This database also has the purpose of sending news and contents related to the services provided by THT.

Processing

The personal information contained in this database is subject to collection, inclusion in the platform, storage, use, internal circulation, archiving and deletion of data.

The information contained in this database is stored in the Sharpspring email marketing platform and physically in an AZ. The information has limited access. The information that is stored in physical form is properly stored in THT's offices.

The information is processed according to the different modules and algorithms designed, standardized and validated by THT.

Regarding security measures, THE COMPANY has implemented restrictions in the creation, manipulation and visualization of data. THT makes daily copies of the information, performs maintenance to its computer equipment, provides specialized training to its engineering team and legally safeguards the control over the data.

It is important to note that the information may be deleted at the request of the Data Subject. For the deletion of data, the informed consent of the natural person who applied the data must be obtained and the client organization from where the person accessed the THT platform must be informed.

Likewise, THE COMPANY has established policies of confidentiality commitment of workers for data processing. Finally, it should be noted that this database complies with the general purposes set forth in section 10 of this Manual.

Validity

This database will be in force for a period of 1 year following the date of the individual registration of the personal data.

5.1.3. Database of Suppliers

Description

Although most of the suppliers are legal entities, this database corresponds to the personal information that is collected on natural persons who provide services or sell products to THE COMPANY. This database is managed by the Administrative area and by the External Accountants of THE COMPANY.

Content

This database contains the following personal information: Full name, identification document, address, telephone number, bank information and tax information. It also collects email, name of the organization, number of collaborators and country.

How data is collected

The information is obtained directly through the Supplier Registration Form, through the RUT, the information from the Chamber of Commerce, the copy of the identification document and the bank certification. This form includes the respective authorization of the holder for the processing of personal data.

Purpose

The information contained in this database is intended to create the supplier in the COMPANY's system, comply with the obligations arising from the business relationship, make payments, make bank transfers associated with the services provided or products sold to the COMPANY, submission of tax and fiscal information, in accordance with the provisions of current regulations and contact them to hire again.

Processing

The personal information contained in this database is subject to collection, storage, use and circulation.

This database is entered into the SIIGO System and stored in the company's servers enabled to store this information. This information is stored in the SIIGO accounting system on the Administrative Coordinator's computer. These servers have limited access by user.

Regarding security measures, THE COMPANY has implemented restrictions on the creation, manipulation and visualization of data. THT makes daily copies of the information, maintains its computer equipment, provides specialized training to its engineering team, and has legal control over the data.

Likewise, THE COMPANY has established confidentiality policies and commitment of the employees for the treatment of personal information of third parties. Finally, it should be noted that this database complies with the general purposes established in section 10 of this document.

Validity

This database is valid as long as the commercial relationship with the supplier exists plus an additional period of 10 years. Likewise, a historical file of the suppliers that have been linked to THE COMPANY is kept. It is important to bear in mind that THE COMPANY has an Archiving Policy. In such a way that the temporality of this database is in accordance with the Archiving Policy.

5.1.4. Database of active and retired employees

Description

This database contains the information collected on employees (linked through employment contracts), trainees

(linked through apprenticeship and internship contracts governed by a framework agreement between Cavalier and the respective university) and is managed by the Administrative area of THE COMPANY.

This database also includes the information of retired employees with whom THE COMPANY does not have an employment contract in force.

Content

The personal information contained in this Database contains the following personal data: name, surname, citizenship card, place of issue, date and place of birth, marital status, place of residence, address, landline and cell phone, city, user name for access to the platform, salary, date of entry, date of medical examination, pension fund, EPS [Health Providers] , severance fund, data of family members including children and adolescents in the first degree of consanguinity, photographic records and biometric record (fingerprint), occupation, position, formal and certified academic information, level of studies, degree obtained, date of completion, name of the institution, other studies, languages, work experience, special medical conditions, position held, name of the company, telephone, name of immediate boss, start date, retirement date, data of the person to contact in case of emergency, name, relationship, company, position, section, type of relationship, working day, basic salary, bank account number for payroll, bank and city.

In addition, certain sensitive data are collected: data of minors, photographic records and biometric records (fingerprint).

How the data is collected

THE COMPANY collects the information contained in this database from the recruitment process, from the resume, from the registration of the Cavalier Abogados website and by Email). The Data are requested to the Data Subjects through the employment or service contract and by means of the curriculum vitae form..

Purpose

The aforementioned data are collected in order to comply with the obligations arising from the labor contract, among which are, the handling of requests, the generation of certificates, the affiliation to the entities of the Social Protection System, the carrying of activities of Labor Welfare activities, the compilation of accounting records, reports to control and surveillance authorities, contact with the employee, cause taxes, communication in case of absence, among other administrative and contact purposes.

Sensitive data such as the fingerprint, are used for information related to the employee's health, used in emergency cases, or for reporting to the entities of the Social Security Health System and for the registration of times, income and departures.

Processing

El tratamiento que recibe esta base de datos por parte de LA EMPRESA en su condición de responsable y encargada iThe processing that this database receives by THE COMPANY in its capacity as responsible and in charge includes processing in a physical and electronic file, collection, storage, use, circulation and updating. The data is also used to send reports to administrative entities that request it, based on the rules of the Social Security System and complementary.

Regarding security measures, and according to the state of technology, the data stored and the risks to which they may be exposed, THE COMPANY has adopted security measures, administrative, technical and physical, to protect personal data against damage, loss, alteration, destruction or unauthorized use, access or processing.

It is also important to note that the information is not used to offer services or products of third parties. The information contained in this database is for the exclusive use of THE COMPANY. Additionally, this database complies with the general purposes established in section 10 of this Manual.

Processing

This Database will be in force as long as the labor relationship between the employee and THE COMPANY exists, and for pension contribution matters, the information is kept for more ninety (90) years counted from the date of liquidation of the contract. Likewise, THE COMPANY keeps the information in a historical file of the people who have been linked to THE COMPANY..

5.2. Databases in which Special Data is collected

5.2.1. Sensitive Databases

For the purposes of handling Sensitive Data, THE COMPANY has obtained the corresponding authorization from the Data Subjects whose information is contained in their Databases and will obtain prior authorization whenever new data is involved.

For the treatment of sensitive data THE COMPANY has complied with the following obligations:

- Informed the Data Subject that since the data was Sensitive Data, they were not obliged to authorize its processing.
- Informed the Data Subject which of the data are Sensitive and the purpose of the Processing.
- THE COMPANY does not condition any activity to the provision of Sensitive Data by the Data Subject.

5.2.2. Personal Database

This database is described in section 7.1 of this Manual.

5.3. International transfer of personal data

The transfer of personal data of any kind to countries that do not provide adequate levels of data protection is prohibited. It is understood that a country offers an adequate level of data protection when it complies with the standards set by the competent entity on the matter, which in no case may be lower than those required by this law to its recipients. This prohibition shall not apply in the case of:

- a. Information with respect to which the Data Subject have given their express and unequivocal authorization for the transfer.
- b. Exchange of medical data, when so required by the Processing of the Data Subject for health or public hygiene reasons.
- c. Bank or stock exchange transfers, in accordance with the applicable legislation.
- d. Transfers agreed within the framework of international treaties, based on the principle of reciprocity.
- e. Transfers necessary for the execution of a contract between the Data Subject and the Data Controller, or for the execution of pre-contractual measures, as long as the Data Subject's authorization is obtained.
- f. Transfers legally required for the safeguarding of the public interest, or for the recognition, exercise or defense of a right in a judicial proceeding.

5.3.1 Adequate level of protection standards of the country receiving the personal information

The country receiving an international transfer of personal data must be a guarantor of the protection of personal data, in accordance with the above premise, the following standards for the international transfer of personal data should be studied:

- a. Existence of rules applicable to the processing of personal data.
- b. Establishment of rules on principles applicable to data processing, including: legality, purpose, freedom, truthfulness or quality, transparency, access and restricted circulation, security and confidentiality.
- c. Establishment of rules on the rights of the Data Subjects.
- d. Establishment of rules on duties of the Controllers and Processors.
- e. Existence of judicial and administrative means and channels to guarantee the effective protection of the rights of the Data Subjects and to demand compliance with the law.
- f. Existence of public authority (ies) in charge of supervising the processing of personal data, compliance with applicable legislation and the protection of the rights of the data subjects, who effectively exercise their functions.

6. Data Subject's authorization for data processing

THE COMPANY as Data Controller has developed an "Authorization for the Processing of Personal Data" form and has adopted procedures to request, at the latest at the time of collection of your personal data, your authorization for the Processing thereof and to inform you what personal data will be collected as well as all the specific purposes of the Processing for which your consent is obtained.

Personal data that are in publicly accessible sources, regardless of the means by which they are accessed, may be processed by THE COMPANY, provided that, by their nature, they are Public Data.

It shall be understood that the authorization granted by the Data Subject to THE COMPANY complies with the requirements of the applicable legislation in force, when it is expressed: - In writing - Orally - Through unequivocal conduct of the Data Subject that allows to reasonably conclude that they granted THE COMPANY the respective authorization. In any case, their silence will be assimilated by THE COMPANY as an unequivocal conduct.

THE COMPANY has established channels so that the Data Subject may at any time request, as Data Controller or Data Processor, the deletion of their personal data and/or revoke the authorization granted to us for the processing of such data.

7. Data Subject's authorization for sensitive data processing

In the Processing of sensitive personal data, when such Processing is possible in accordance with the provisions of the aforementioned legislation, THE COMPANY shall comply with the following obligations:

- 7.1. Inform the Data Subject that since the data is sensitive, they are not obliged to authorize its Processing.
- 7.2. Inform the Data Subject explicitly and in advance, in addition to the general requirements of authorization for the collection of any type of personal data, which of the data to be processed are sensitive and the purpose of their processing, and also obtain their express consent.

None of the activities carried out by THE COMPANY is or will be conditioned to the provision of sensitive personal data by the data subject.

8. Use and purpose of the processing of personal data

THE COMPANY as an entity respectful of the privacy of individuals recognizes that the Data Subject of the personal data has the right to have adequate elements to ensure the same, taking into account their responsibilities, rights and obligations.

By virtue of the relationship that has been or will be established between the Data Subject and THE COMPANY, it is important for the Data Subject to know that THE COMPANY collects, records, stores and uses the Personal Data of the Data Subject for its own use for the purposes requested or as required by public entities.

The Personal Data of the Data Subject are used by THE COMPANY to: - Execute THE COMPANY's own activities to fulfill its corporate purpose, all of which will be done based on the purpose of the Database in which the Personal Data of the Data Subjects rest. - Offer products, services and or benefits that seek to satisfy the needs of the Data Subjects, or the products and services of THE COMPANY, which can be done by physical means or through e-mails and/or mobile terminals. - Send the information to governmental entities by legal requirement. • Consult information in control lists (National and International Lists), consult information centers, Clinton List, administrative entities in order to preserve trust and transparency between the Data Subject and THE COMPANY • Support external and internal auditing processes. • For the execution of judicial and extrajudicial processes in the cases allowed by the Bylaws and Regulations of THE COMPANY. • Register the information of employees, former employees, suppliers, customers (active and inactive) in the databases of THE COMPANY, for the sending of contractual, commercial and obligatory information as the case may be. • Verify references of employees, former employees, suppliers, customers (active and inactive) in the databases. • Regarding the collection and processing of data through automated mechanisms in order to generate records of visitor activity and audience records, THE COMPANY may only use such information for the preparation of reports that meet the stated objectives. Under no circumstances may it carry out operations that imply associating such information to any identified or identifiable user.

The Personal Data will be used by THE COMPANY only for the purposes stated herein, therefore, THE COMPANY will not sell, license, transmit or disclose the Personal Data, unless: • The Data Subject expressly authorizes to do so • The Data Subject's information is related to a merger, consolidation, acquisition, divestiture or other restructuring process of THE COMPANY • It is permitted by law.

For the internal handling of the Data, these may be known by the authorized personnel of THE COMPANY, which includes the General Assembly of Shareholders, the Board of Directors, the Statutory Auditor, the Presidency, the Vice-Presidencies and the Managements.

THE COMPANY may subcontract to third parties for the processing of certain functions or information. When this

occurs, such third parties shall be obliged to protect the Personal Data in the terms required by law and in their capacity as Controllers for the management of the COMPANY's Databases.

In the case of transmission of personal data, THE COMPANY will sign the corresponding transmission contract. Likewise, THE COMPANY may transfer or transmit (as appropriate), keeping the due security measures, the personal data to other entities in order to provide a better service, in accordance with the authorizations that have been granted by the Data Subject of the personal data.

Once the need for the Processing of Personal Data ceases, the same will be eliminated from the COMPANY's databases under secure terms..

9. Privacy Notice

This legend is printed on all forms or documents through which information is collected from current and potential customers, suppliers, employees and former employees, and other holders of personal data handled by THE COMPANY. When collected verbally, this legend is communicated to the Holder in the same way, and the authorization is recorded through technical means provided for that purpose.

Privacy Notice:

THT THE TALENT SYSTEM S.A.S., declares that it protects the personal data provided by the Data Subjects in accordance with the provisions of the Law and informs them that the personal data will be used in the terms given in the authorization by the Data Subject.

The personal data provided by the Data Subject will be used by THE COMPANY to provide its human talent development consultancies, as well as the purposes set forth in the Privacy Policy.

The data will be collected, stored, updated, used, circulated and backed up in accordance with the provisions of the Privacy Policy.

THT THE TALENT SYSTEM S.A.S. will be the Controller and Processor of the data processing. The processing may be carried out directly by THT THE TALENT SYSTEM S.A.S. or by the third party it determines.

Validity of the data: The personal data provided by the Data Subjects will be kept stored in accordance with the provisions of the Privacy Policy.

The Data Subject has the right to know, update, rectify, revoke, request deletion, file complaints and claims, and other rights contained in current legislation, regarding the data provided.

*The Data Subject may know the Privacy Policy of THT THE TALENT SYSTEM S.A.S., through the following link:
<http://tht.company/>*

The contact details of THE COMPANY e-mail: administrativo@tht.company.

Authorization:

THT THE TALENT SYSTEM S.A.S. declares that it protects the personal data supplied by its customers and end users in accordance with the provisions of U.S. law.

The personal data provided by you are used by THT THE TALENT SYSTEM S.A.S. to provide its development consultancy in human talent, as well as the purposes foreseen in the Internal Manual of Policies and Procedures for the Processing of Personal Data. THT THE TALENT SYSTEM S.A.S. may collect, store, process and dispose of your personal data, as well as offer you products, services and or benefits that seek to meet your needs.

By signing this authorization, you declare that all the data contained herein are accurate and truthful and that THT THE TALENT SYSTEM S.A.S. has previously and expressly informed you of the rights you have and the purpose, treatment and validity that will be given to my personal data.

Consequently, from the above, you expressly authorize in a free, prior, voluntary and duly informed manner THT THE TALENT SYSTEM S.A.S. to collect, store, process and dispose of your data, as well as to transfer such data to natural or legal persons in order to treat your data in accordance with the purposes and conditions mentioned in the privacy notice, which you declare to know and accept. You understand that it is possible that within the tests carried out, sensitive information

may be provided in accordance with the provisions of the law, for which you expressly authorize its processing.

Signature

Date:

For the Web page:

THT THE TALENT SYSTEM S.A.S., declares that it protects personal data in accordance with the provisions of the Law.

By signing this authorization, you declare that all the data provided by you are accurate and truthful. The personal data provided by you are used by **THT THE TALENT SYSTEM S.A.S.**, for the provision of services in human talent, to contact you, to invoice our products, for credit management, for reporting to risk assessment centers, for surveys, for commercial information about new products or services, for events, for advertising campaigns, promotions or contests, according to our privacy policy that can be consulted in the following [LINK](#).

Through this (CLICK) you agree to have read and understood our personal data policy and therefore, you freely accept the processing that we will give to your personal data, which includes storing, processing, disposing, as well as transferring such data to natural or legal persons in accordance with the purposes and conditions mentioned in our privacy policy.

Signature

Date:

10. Revocation of Authorization and/or Deletion of Data

THE COMPANY has provided a free and agile mechanism through which the Data Subject may at any time, and provided that there is no legal or contractual duty that prevents it, request THE COMPANY to delete the personal data and/or revoke the authorization granted for the Processing thereof, by submitting a request (See chapter 12 of this Manual).

11. Rights of Data Subjects

The following are the rights of the Data Subject in relation to their personal data: a. To know, update, cancel and rectify their personal data against the Data Controllers or Data Processors. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or data whose Processing is expressly prohibited or has not been authorized. b. Request proof of the authorization granted to the Data Controller, except when expressly exempted as a requirement for the Processing. c. Be informed by the Data Controller or the Data Processor, upon request, regarding the use given to their personal data. d. File complaints before the corresponding entities for violations of the provisions of current legislation and other rules that modify, add or supplement it. e. To revoke the authorization and/or request the deletion of the data when the Processing does not respect the principles, rights and constitutional and legal guarantees. f. To access free of charge to their personal data that have been subject to Processing.

The channels that exist in THE COMPANY for the exercise of the rights of the Data Subject are set forth in Chapter 12 of this Manual.

12. Procedure for the exercise of the data subject's rights

1. Procedure for Consultations: Users of the <http://tht.company/> web page may exercise the aforementioned rights recognized by the Privacy Act of 1974 at any time and free of charge, by means of a communication addressed to THE COMPANY, or by sending an e-mail to: administrativo@tht.company, **Reference:** Personal Data Protection. We also remind you of your right to file a complaint with the Federal Trade Commission (FTC) or the competent federal agency regarding the processing of your personal data by THT.

THT will not use your personal data for any purpose other than that expressed in this document and will keep the information provided confidential. Also, always and in every message will include an email address administrativo@tht.company company where users can exercise at any time their rights of access, limitation, rectification or opposition, to unsubscribe at any time, and therefore not receive any information or communication. THT is concerned about ensuring the security and confidentiality of your data. Therefore, we inform you that we have implemented technical and organizational measures in accordance with the "Principle of integrity and

confidentiality”, which ensure adequate security of personal data including protection against unauthorized or unlawful processing, and/or prevent its alteration, loss, destruction or accidental damage, given the state of technology, the nature of the data stored and the risks to which they are exposed, whether from human action or the physical or natural environment. We remind you that you have the right to request:

- more details about our use of your information,
- a copy of the information you have provided to us,
- correct inaccuracies in the information we hold,
- delete information for whose use we no longer have a legal basis,
- revoke your consent to the processing of your data for those purposes, in cases where the processing of data is conditional on consent, as well as for any direct marketing communications,
- object to any processing of your data - including profiling - that takes legitimate interest as a legal basis, unless our reasons for carrying out such processing compensate any possible prejudice towards your data protection rights,
- restrict the way we use your data while investigating a complaint. Your exercise of these rights is subject to certain exceptions in the public interest (e.g., the prevention or detection of crime) and in our own interests (e.g., maintaining the confidentiality of legal advice).

If you exercise any of these rights, we will check that you are in fact entitled to do so, we will respond to you within one month or within the maximum period provided for by U.S. law, whichever is shorter.

13. Security measures applied to the processing of databases

The information is protected through mechanisms that preserve its security, confidentiality, integrity and availability, to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access using the following mechanisms:

- Preserving the information under the necessary security conditions to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access.
- Protection of access to data by means of passwords and roles of different levels of authority.
- Ensuring the level of complexity of user passwords.

14. Prohibitions

In the development of this personal information security rule, the following prohibitions and sanctions are established as a consequence of non-compliance.

- **THT THE TALENT SYSTEM S.A.S.**, prohibits the access, use, management, transfer, communication, storage and any other processing of sensitive personal data without the authorization of the data subject of the personal data and/or of **THT THE TALENT SYSTEM S.A.S.**
- Incurring in this prohibition on the part of the employees of **THT THE TALENT SYSTEM S.A.S.** shall entail the sanctions that may be applicable in accordance with the law.
- **THT THE TALENT SYSTEM S.A.S.**, prohibits the transfer, communication or circulation of personal data, without the previous, written and express consent of the owner of the data or without the authorization of **THT THE TALENT SYSTEM S.A.S.** The transfer or communication of personal data must be registered in the central registry of personal data of the company **THT THE TALENT SYSTEM S.A.S.** and have the authorization of the custodian of the database.
- The company **THT THE TALENT SYSTEM S.A.S.**, prohibits the access, use, transfer, communication, treatment, storage and any other treatment of sensitive personal data that may be identified in an audit procedure in application of the rule on the good use of the IT resources of the companies and/or other rules issued by the company **THT THE TALENT SYSTEM S.A.S.** for these purposes. The sensitive data that may be identified in the audit process will be informed to the user of the IT resource, so that they may proceed to eliminate them; if this option is not possible, **THT THE TALENT SYSTEM S.A.S.** will proceed to eliminate them in a safe way.
- The company **THT THE TALENT SYSTEM S.A.S.**, prohibits the recipients of this rule from any personal data processing that may give rise to any of the conducts described in the regulations on computer crimes.
- **THT THE TALENT SYSTEM S.A.S.**, prohibits the processing of personal data of children and minors. Any treatment that may be done with respect to the data of minors, must ensure the prevailing rights that the regulations recognize to them. In cases of treatment of this data, the authorization must be granted by the legal representatives, as the case may be.

15. Handling of cookies.

Users/data subjects will be informed of the use of own and third-party cookies which will generate a better navigability, and inform them that cookies are not personal data, therefore, the notice of use of cookies will be as

follows:

“Dear User, we hereby inform you that we use our own and third-party cookies to improve our services, to offer you a better navigability of our web portal and to establish your preferences in it. We clarify that cookies are not personal data if you have any questions on the subject of cookies please write to the email: nombre@domain.com

Button to accept “I accept”

16. Designation of a department or person in charge of the procedure for the data subject to exercise their rights of petitions, queries and complaints.

The responsibility for the adequate treatment of personal data within THT THE TALENT SYSTEM S.A.S. is in the hands of all employees. Consequently, within each area that handles business processes involving the processing of personal data, they must adopt the rules and procedures for the application and compliance with this standard, given their status as custodians of the personal information contained in the information systems of THE COMPANY.

The unit in charge of processing inquiries, complaints, claims and petitions related to the treatment and protection of personal data of customers, employees, suppliers, creditors and other holders of personal data handled by THE COMPANY in its databases, shall be the Administrative area.

The person(s) in charge will be: Sandra Maldonado - Administrative Area her contact details are:

E-mail: administrativo@tht.company

Web pages: <http://tht.company/>; <http://brainhunter.co>

17.Modification of the Privacy Policy

THT THE TALENT SYSTEM S.A.S., iTHT THE TALENT SYSTEM S.A.S. will inform the Data subjects in case of substantial changes in the content of this Personal Data Processing Policy Manual, referring to the identification of the Controller and/or Processor and the purpose of the Personal Data Processing, which may affect the content of the authorization that the data subjects have granted to THE COMPANY. Likewise, the data subjects will be informed of such changes before or at the latest at the time of the implementation of the new policies.

In addition, when the change refers to the purpose of the processing of personal data, THE COMPANY will obtain a new authorization from the data subjects of the personal data.

For this purpose, we have provided on the websites of the companies our web channel: <http://tht.company/>, through which you will be informed about the change and will be made available the latest version of this manual or the mechanisms enabled by THE COMPANY to obtain a copy of it..

18.Into force of the Privacy Policy

This Personal Data Processing Policy was updated on November eleventh (11th), two thousand sixteen (2016) and is effective as of November first (1st), two thousand sixteen (2016).

Cordially,

JUAN DAVID GÓMEZ GUTIÉRREZ
LEGAL REPRESENTATIVE
THT THE TALENT SYSTEM S.A.S.



We **predict**
the human
behavior