

Data Processing Policy

AmCham Antioquia & Caldas
2026



Data Processing Policy

AmCham Antioquia & Caldas

1. Data Controller

AmCham Antioquia y Caldas, Colombian American Chamber of Commerce – Medellín Chapter, identified with NIT 800021540, is a private non-profit entity with legal status granted by the Ministry of Justice, located at Calle 4 Sur # 43A-195, Office 163D, El Poblado, Antioquia.

- **Contact:** comunicaciones@amchamedellin.com
- **Cell Phone:** (+57) 3145850196
- **Website:** www.amchamedellin.com

2. Definitions

- **Authorization:** The prior, express, and informed consent of the data subject to carry out the processing of personal data.
- **Database:** An organized set of personal data stored in any medium (physical, electronic, or automated).
- **Personal Data:** Any information linked to or that can be associated with one or more specific or determinable natural persons.
- **Data Subject:** The natural person whose personal data is being processed.
- **Processing:** Any operation or set of operations performed on personal data, such as collection, storage, use, circulation, or deletion.
- **Privacy Notice:** A communication addressed to the data subject regarding the processing policies and purposes.
- **Sensitive Data:** Data that affects the privacy of the data subject (ethnic origin, health, sex life, biometric data) or whose improper use may generate discrimination.
- **International Transfer:** Sending data to recipients outside of Colombia, with guarantees of equivalent protection.

3. Stakeholders

The stakeholders to whom this policy applies include members, strategic allies, employees, government or private entities from Colombia and the U.S., and suppliers. Each of these groups maintains a direct relationship with AmCham Antioquia & Caldas and contributes to the fulfillment of institutional objectives through membership, collaboration, the provision of services, the creation of strategic alliances, or participation in our activities and programs.

4. Rights of Data Subjects

- To know, update, rectify, and delete data.
- To request proof of authorization and be informed about how their data has been used.
- To be informed by the Data Controller or Data Processor, upon request, regarding the use given to their personal data.
- To revoke authorization or delete data if legal principles are violated.
- To access their processed data free of charge.

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- To file complaints with the Superintendency of Industry and Commerce (SIC) for violations of Law 1581/2012.
- To refrain from answering questions about sensitive data. Answers to questions regarding sensitive data or data of children and adolescents shall be optional.

These rights may be exercised by:

- The personal data subject.
- The successors in interest (*causahabientes*) of the data subject.
- The representative and/or attorney-in-fact of the data subject.

5. Data Subject Authorization

Prior, express, and informed authorization is required via forms mentioning this policy, contact details, and a signature space. Exceptions: judicial order, public data, medical emergencies, historical/statistical purposes, or Civil Registry data.

6. Purposes of Data Processing

Data processing is conducted to perform the inherent functions of AmCham Antioquia y Caldas, such as the promotion of trade, investment, tourism, knowledge transfer, and cooperation between Colombia and the U.S. Data is collected for business relations, marketing, event invitations (virtual/in-person), networking, market research, employment placement, and the management of members, committees, suppliers, and allies.

The collected personal data will be used to manage the relationship with our stakeholders, including sending relevant communications through the available digital channels such as email, WhatsApp, and others. Furthermore, data is used to include and maintain updated information in the institutional database, send information for commercial purposes, promote events, activities, and services, as well as share relevant information with other members and strategic allies, provided that authorization has been granted for such purposes. Data will also be used to comply with legal, administrative, and contractual obligations, improve our processes, and personalize our users' experience.

In particular, personal data may be used for the following purposes:

- **6.1.** To include and maintain updated contact information of data subjects in the institutional databases of AmCham Antioquia & Caldas.
- **6.2.** To manage relationships with members, strategic allies, government entities, companies, suppliers, event participants, and other stakeholders, including administrative, commercial, and institutional processes.
- **6.3.** To send institutional, commercial, and relevant interest information related to activities, programs, services, business opportunities, studies, reports, publications, and other content developed by AmCham Antioquia & Caldas.
- **6.4.** To invite, register, and manage participation in events, committees, training, business matchmaking sessions, trade missions, networking meetings, and other

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activities organized or supported by AmCham Antioquia & Caldas, whether in-person or virtual.

- **6.5.** To conduct institutional and relationship communications through different channels such as email, phone calls, text messages, WhatsApp, or other digital, physical, or media means.
- **6.6.** To promote services, programs, projects, and benefits offered by AmCham Antioquia & Caldas to its members and stakeholders.
- **6.7.** To facilitate spaces for business matchmaking, networking, and the generation of business opportunities among members, companies, and strategic allies, including the exchange of contact information when relevant.
- **6.8.** To perform statistical analysis, market research, surveys, and satisfaction evaluations in order to improve the organization's services, programs, and activities.
- **6.9.** To manage employment, contractual, or service provision onboarding processes when the data subject participates in selection or hiring processes.
- **6.10.** To comply with legal, regulatory, and contractual obligations applicable to AmCham Antioquia & Caldas before administrative or judicial authorities.
- **6.11.** To guarantee information security, prevent fraud, and protect the institutional interests of AmCham Antioquia & Caldas and its stakeholders.
- **6.12.** To share information with strategic allies or related entities when necessary for the development of institutional activities, always respecting the current regulations on personal data protection.

The aforementioned purposes will be carried out at all times respecting the principles of legality, purpose, freedom, truthfulness, transparency, access, and security established by Colombian regulations on personal data protection.

7. Information Security

Technical and administrative measures are adopted to protect data against alteration, loss, or unauthorized access in compliance with Decree 1074/2015 (Single Regulatory Decree on Data Protection). In this regard, AmCham relies on security technology tools and implements recognized safety practices, including: information transmission and storage through secure mechanisms such as encryption, use of secure protocols, restriction of information access to authorized personnel only, data backups, secure software development practices, firewalls, and antivirus software, among others.

Third parties contracted by AmCham who must perform Personal Data Processing are equally obliged to adhere to and comply with this Privacy Policy, as well as to know the measures and guidelines established in the information security manuals and security protocols, which will be made available to them in order to ensure data security.

8. Customer Service Channels

The area responsible for handling requests, inquiries, and claims is the Communications Department, whose contact details are:

- **Email:** comunicaciones@amchamedellin.com

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- **Cell Phone:** 3145850196
- **Hours:** Monday to Friday from 7:30 a.m. - 12:00 p.m. / 2:00 p.m. to 4:30 p.m.

9. Obligations of AmCham Antioquia & Caldas

AmCham Antioquia & Caldas recognizes that personal data belongs to the data subjects and that only they can make decisions regarding it. In this sense, it will make exclusive use of it for those purposes authorized under the terms of the law. In light of the above, it notes the duties it assumes in its capacity as data controller:

- To guarantee the Data Subject, at all times, the full and effective exercise of their rights.
- To seek the means to obtain express authorization from the data subject to perform any type of processing and retain a copy of said authorization.
- To clearly and expressly inform its users, employees, suppliers, and third parties in general from whom it obtains data about the processing to which it will be subjected.
- To inform data subjects in each case of the optional nature of responding and providing the respective information requested.
- In all cases where data is collected, to inform data subjects of the rights they hold regarding their data.
- To preserve information under the necessary security conditions to prevent its alteration, loss, unauthorized consultation, use, or fraudulent access.
- To guarantee the information data subject, at all times, the full and effective exercise of the right to *habeas data*.
- To rectify information when it is incorrect and communicate the relevant updates to the Data Processor.
- To supply the Data Processor, as applicable, only with data whose processing has been previously authorized in accordance with the provisions of this policy.
- To inform the data protection authority when violations of security codes occur and risks exist in the management of the data subjects' information.
- To comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

10. Procedures for Handling Claims and Inquiries

- **Inquiries:** To file inquiries regarding data protection, data subjects must use the customer service channels indicated in section 8 of this policy. Please attach identification (data subject/successor in interest/representative), and we will respond within 10 business days, with the possibility of an extension of up to 5 additional days.
- **Claims:** To file claims regarding data protection, data subjects must use the customer service channels indicated in section 8 of this policy. Please include a description of the facts, a notification address, and supporting evidence. Please label the subject line as "Claim". We will respond within 15 business days, with a possible extension of 5 additional days. If the claim is incomplete or additional information is required, we will inform you, and you will have a period of 5 business days to rectify it. If no response is received, it will be understood as a withdrawal of the claim after 2 months.

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11. Validity and Updates

This Personal Data Processing Policy is effective as of March 2026 and will remain in effect while AmCham Antioquia & Caldas conducts personal data processing in the development of its activities.

The databases managed by AmCham Antioquia & Caldas will remain valid for the duration of the relationship with the data subject and for the period necessary to fulfill the purposes described in this policy. Once these purposes are fulfilled, and provided there is no legal or contractual duty requiring its retention, the personal data will be deleted from the databases or anonymized in accordance with the organization's internal procedures.

AmCham Antioquia & Caldas may update this policy when regulatory or institutional changes occur, or when modifications are made to the purposes of personal data processing. Any substantial modification will be communicated to the data subjects through institutional channels.

In accordance with current regulations, and particularly with Law 1581 of 2012 and Decree 1074 of 2015, the organization will adopt the necessary measures to guarantee the proper management and protection of personal information.

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