



**HOTELES SIBELIUS SAS**

**MANUAL OF POLICIES AND PROCEDURES FOR THE  
PROTECTION OF PERSONAL DATA**

**MARZO 2026**

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The following outlines the information processing policies governing the activities of **HOTELES SIBELIUS S.A.S** and the management of its databases. This document is developed in compliance with Law 1581 of 2012, "By which general provisions are issued and pertinent measures are taken for the protection of personal data," according to which all public or private entities that handle personal data must adopt an internal manual of policies and procedures to guarantee proper compliance with the law and, in particular, to ensure the effective exercise of the rights of data subjects. All information collected and stored by **HOTELES SIBELIUS S.A.S** through its various communication channels, whether digital or printed, and which forms part **HOTELES SIBELIUS S.A.S** 's databases , obtained from clients, suppliers, employees, partners, and the general public, is governed by the following usage policies, and this information will be treated as highly confidential. If you are listed in any of our databases, it is because you have had or maintain a business relationship with **HOTELES SIBELIUS S.A.S** or because you have voluntarily provided your data in activities carried out by **HOTELES SIBELIUS S.A.S** or directly at our offices.

Information from the data controller:

- **HOTELES SIBELIUS S.A.S** identified with NIT: 901.879.354-3

**ARTICLE 1. APPLICABLE LEGISLATION .** This manual was prepared taking into account the provisions contained in Law 1581 of 2012 “By which general provisions are issued for the protection of personal data”, Decree 1377 of 2013 “By which Law 1581 of 2012 is partially regulated” and Decree 886 of 2014 “By which article 25 of Law 1581 of 2012, relating to the National Registry of Databases, is regulated”.

**ARTICLE 2. SCOPE OF APPLICATION.** This manual shall apply to the processing of personal data collected and handled by the company **HOTELES SIBELIUS S.A.S.**

**ARTICLE 3. PURPOSE.** To protect and guarantee, based on this manual, the fundamental right of habeas data regulated by Law 1581 of 2012, which regulates the procedures for the collection, handling and processing of personal data carried out by the company **HOTELES SIBELIUS S.A.S.**

**ARTICLE 4. VALIDITY OF THE DATABASE.** The company **HOTELES SIBELIUS S.A.S** will apply the policies and procedures contained in this manual to the databases over which it has decision power, for a term equal to that statutorily established for the duration of the company.

**ARTICLE 5. PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA.** In the regulation and interpretation for the application of this law, we will apply the following principles in a comprehensive manner:

**a) Principle of legality in matters of Data Processing:** The Processing referred to in this manual is a regulated activity that must comply with the provisions of Law 1581 of 2012 and other provisions that develop it;

**b) Principle of purpose:** The Processing must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Data Subject;

**c) Principle of freedom:** Processing may only be carried out with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that waives the requirement for consent;

**d) Principle of truthfulness or quality:** The information subject to processing must be truthful, complete, accurate, up-to-date, verifiable, and understandable. The processing of partial, incomplete, fragmented, or misleading data is prohibited;

**e) Principle of Transparency:** In the Processing, the right of the Data Subject to obtain from the Controller or the Processor, at any time and without restrictions, information about the existence of data concerning him or her must be guaranteed;

**e) Principle of restricted access and circulation:** The Processing is subject to the limits derived from the nature of the personal data, the provisions of this manual, Law 1581 of 2012, and the Constitution. In this regard, the Processing may only be carried out by persons authorized by the Data Subject and/or by the persons provided for by law; Personal data, except for public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted access only to the Data Subjects or third parties authorized in accordance with the law;

**g) Security Principle:** The information subject to Processing by the Data Controller or Data Processor referred to in this manual, must be handled with the technical, human and administrative measures that are necessary to provide security to the records, preventing their alteration, loss, consultation, use or unauthorized or fraudulent access;

**h) Principle of Confidentiality:** All persons involved in the processing of personal data that are not of a public nature are obliged to guarantee the confidentiality of the information, even after their relationship with any of the tasks that comprise the processing has ended, and may only supply or communicate personal data when it corresponds to the development of the activities authorized by law and in accordance with its terms.

## II. RIGHTS AND DUTIES

**ARTICLE 6. RIGHTS OF DATA SUBJECTS.** In accordance with the provisions of Law 1581 of 2012, the data subject has the following rights:

- a) To know, update and rectify your personal data before the Data Controllers or Data Processors. This right may be exercised, among others, with respect to partial, inaccurate, incomplete, fragmented, 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, in accordance with the provisions of Article 10 of Law 1581 of 2012;
- c) To be informed by the Data Controller or the Data Processor, upon request, regarding the use that has been made of your personal data;
- d) To submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and other regulations that modify, add to or complement it;
- e) Revoke authorization and/or request the deletion of data when the Processing does not respect constitutional and legal principles, rights, and guarantees. Revocation and/or deletion will proceed when the Superintendency of Industry and Commerce has determined that the Controller or Processor has engaged in conduct contrary to this law and the Constitution;
- f) Access free of charge to your personal data that has been processed.

**ARTICLE 7. DUTIES OF THE DATA CONTROLLER :** As the Data Controller of personal data, and in accordance with the provisions of Law 1581 of 2012, **HOTELES SIBELIUS S.A.S** undertakes to comply with the following duties, in relation to the processing of personal data:

- a) Guarantee to the Holder, at all times, the full and effective exercise of the right of habeas data;
- b) Request and keep, under the conditions provided for in this law, a copy of the respective authorization granted by the Holder;

- c) Inform the Holder duly, either in writing or in a public publication to be reviewed, about the purpose of the collection and the rights they have by virtue of the authorization granted;
- d) Keep the information under the necessary security conditions to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access;
- e) Ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable;
- f) Update the information, promptly informing the Data Controller of any changes to the data previously provided and take other necessary measures to ensure that the information provided to the Data Controller remains up to date;
- g) Rectify the information when it is incorrect and communicate the relevant information to the Data Controller;
- h) To provide the Data Processor, as the case may be, only with data whose processing has been previously authorized in accordance with the provisions of this law;
- i) Require the Processor at all times to respect the security and privacy conditions of the Data Subject's information;
- j) Process inquiries and claims made in accordance with the terms set out in this law;
- k) Adopt an internal manual of policies and procedures to ensure proper compliance with this law and, in particular, to handle inquiries and complaints;
- l) Inform the Data Controller when certain information is under discussion by the Data Subject, once the complaint has been filed and the respective process has not been completed;
- m) Inform the Data Subject, upon request, about the use given to their data;
- n) Inform the data protection authority when security code violations occur and there are risks in the management of the information of the Data Subjects.
- o) Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

### III. AUTHORIZATION AND PURPOSE ARTICLE

**ARTICLE 8. AUTHORIZATION.** The company **HOTELES SIBELIUS S.A.S**, in its capacity as the Controller of personal data, has generated the necessary and timely mechanisms to obtain the authorization of the data subjects, guaranteeing in all cases that it is possible to verify said authorization.

**ARTICLE 9. PURPOSE OF THE AUTHORIZATION.** The use of the personal data of the Data Subjects will be carried out by the company **HOTELES SIBELIUS S.A.S**, for the following purpose: Development and control of the commercial relationship between the data subjects and the company **HOTELES SIBELIUS S.A.S**; execution and development of the corporate purpose of the company **HOTELES SIBELIUS S.A.S**, carrying out, directly or through third parties, market studies; measurement of satisfaction levels, information on advertising and promotional campaigns; carrying out surveys, reminders and invitations to events, execution of loyalty campaigns, offering of products, communication of company news and other lawful purposes of a commercial nature; attention and response to requests, complaints and claims from data subjects and authorities and other administrative, legal, commercial or advertising uses necessary for the exercise of the business activity of the company **UNIKA HOTELS CORP COLOMBIA** or that are expressly authorized by the data subjects.

**ARTICLE 10. FORM AND MECHANISMS FOR GRANTING AUTHORIZATION .** Forms 1, 2, 3, and 4 of this document present the authorization forms used by **HOTELES SIBELIUS S.A.S** for the collection and processing of personal data, according to the data subject's classification . The company may also obtain data and authorization. for its processing, by any of the following means: a) Quotations, b) Sales and/or purchase invoices, c) Marketing activities, d) Tax ID number, e) Media digital .

**ARTICLE 11. PRIVACY NOTICE .** Form 5 of this document presents the privacy notice format defined by the company **HOTELES SIBELIUS S.A.S**.

## IV. PROCEDURE FOR EXERCISING THE RIGHTS OF THE DATA SUBJECT

**ARTICLE 12. ATTENTION TO REQUESTS, INQUIRIES AND COMPLAINTS** The company **HOTELES SIBELIUS S.A.S COLOMBIA** will attend to all requests, inquiries and/or complaints of the data subject, related to the rights established in the Law to know, update, rectify and delete or revoke the authorization that he had granted to **HOTELES SIBELIUS S.A.S** regarding his personal data.

**ARTICLE 13. CHANNELS FOR EXERCISING YOUR RIGHTS** Data subjects exercising their rights may make requests, inquiries and/or complaints through the following mechanisms:

Send an email to [info@hotelesb3.com](mailto:info@hotelesb3.com) or visit our website [www.hotelesb3.com](http://www.hotelesb3.com)

**ARTICLE 14. PROCEDURE FOR SUBMITTING INQUIRIES** The data subjects of authorized persons may inquire about their personal information held in our databases. In such cases, we will provide the requested information after verifying their legitimacy to submit the request. The inquiry will be addressed within a maximum of ten (10) business days from the date of receipt. If it is not possible to address the inquiry within this period, the reasons for the delay will be communicated, indicating the date on which the inquiry will be addressed, which in no case may exceed five (5) business days following the expiration of the initial period.

## ARTICLE 15. PROCEDURE FOR SUBMITTING CLAIMS

If the data subjects or authorized persons believe that the information contained in a database should be corrected, updated, or deleted, or if they notice a suspected breach of any of the duties contained in the Regulation, they may file a complaint with us, which will be processed under the following rules:

1. Claims must be submitted in writing to **HOTELES SIBELIUS S.A.S** including the claimant's identification, a description of the events giving rise to the claim, their address, and any supporting documents. If the claim is incomplete, the claimant will be notified within five (5) days of receipt of the claim to correct the deficiencies. If the required information is not submitted within two (2) months of the notification date, the claim will be considered withdrawn. If **HOTELES SIBELIUS S.A.S** is not competent to resolve the claim, it will forward it to the appropriate party within a maximum of two (2) business days and will promptly inform the claimant.
2. If applicable, once the complete claim is received, a note stating "claim in process" and the reason for the claim will be added to the database within no more than two (2) business days. This note must remain until the claim is resolved.
3. The maximum time to address the claim will be fifteen (15) business days, counted from the day following the date of its receipt. If it is not possible to address the claim within this period, the reasons for the delay and the date on which the claim will be addressed will be communicated, which in no case may exceed eight (8) business days following the expiration of the first period.

## **V. SECURITY AND CONFIDENTIALITY OF INFORMATION**

**ARTICLE 16. SECURITY AND CONFIDENTIALITY MEASURES FOR INFORMATION:** For data storage, **HOTELES SIBELIUS S.A.S** employs a technique for the security of personal data, and the transmission of data to those in charge is done in files. Password protected . Access to the systems is protected with a High level of security in authentication and authorization. Databases They are hosted in a data center that provides the levels of integrity, security, confidentiality and availability of information.

Apart from this, there are confidentiality agreements in place, which generates security in the handling of data subjects' information upon entry and Removal of personnel handling information. Reviews are being conducted. periodic preventative checks, thus controlling the changes made to the databases data and thus take corrective action. Security is guaranteed. information through an information backup policy and safeguarding of the same, finally, semi-annual audits will be carried out of the recorded information and security by systems included updates to protection programs such as antivirus software.

## **VII. FINAL PROVISIONS**

**ARTICLE 17. DESIGNATION** . The company **HOTELES SIBELIUS S.A.S** designates the Systems area or the department that performs its functions, to fulfill the function of personal data protection, as well as to process the requests of the holders for the exercise of the rights as the data subject.

**ARTICLE 18. EFFECTIVE DATE:** This manual is effective from Marzo 2026.

**ARTICLE 19: CURRENT REGULATIONS:** This Information Processing Policy is governed by the provisions of Law 1581 of 2012 and Regulatory Decree 1377 of 2013 and other regulations that modify them.



## PRIVACY NOTICE

Responsible party: **UNIKA HOTELS CORP COLOMBIA**, identified with **NIT. 900.510.142-0**

In accordance with the provisions of Law 1581 of 2012, we inform you that the personal data you have provided to us, as a client or provider of goods and services, will be part of our database to be used for the following purposes: Development and control of the commercial relationship between the data subjects and **HOTELES SIBELIUS S.A.S** ; execution and development of the corporate purpose of **HOTELES SIBELIUS S.A.S** ; conducting, directly or through third parties, market research; measuring satisfaction levels; providing information on advertising and promotional campaigns; conducting surveys; sending reminders; implementing loyalty campaigns; offering products; communicating company news; and other lawful commercial purposes; addressing and responding to requests, complaints, and claims from data subjects and authorities; and other administrative, legal, commercial, or advertising uses necessary for the exercise of the business activity of **HOTELES SIBELIUS S.A.S** or expressly authorized by the data subjects. The handling of such data will be done in accordance with the provisions of the "Policies and Procedures Manual for the processing of Personal Data", which contains the policies established by our Company for the processing of data, the mechanisms for the effectiveness of the rights of the data subject to know, update, rectify, delete the data held in our database, as well as to claim from the responsible party and revoke the authorization for its use.