
Personal Data Processing Policy

CANACOL ENERGY and its affiliates have developed the policy included in this document, to be applied in the handling of personal information that is processed by the Company in accordance with Law 1581 of 2012, Decree 1377 of 2013 and the rules that regulate the matter.

The purpose of the Personal Data Processing Policy (the “Policy”) is to establish the guidelines for the collection and processing of personal data, as well as to inform the holders about their rights and the exercise thereof.

1. Identification of the Data Controller

CANACOL ENERGY performs activities related to the exploration and production of hydrocarbons in the Colombian territory.

We make available to the holder, our location and contact data:

Telephone: (1) 621 1747
Address: CL 113 NO. 7-45 TORRE B OFICINA 1501, Bogotá D.C.
Contact e-mail: canacol.sgdp@canacolenergy.com o cne.sgdp@canacolenergy.com
Website: www.canacolenergy.com

2. Definitions

CANACOL ENERGY presents the following definitions to facilitate the interpretation of this Policy.

- a. **Authorization:** Prior, express, and informed consent of the data holder to carry out the processing of his/her personal information.
- b. **Authorized:** Person authorized by the holder of the personal data to carry out any type of procedure or request before CANACOL ENERGY on behalf of the person who authorizes.
- c. **Claim:** Request of the holder of the data or of the persons authorized by the holder or by the law to correct, update, or delete the personal data or to revoke the authorization in the cases established by law.
- d. **Consultation:** Request by the data holder or the persons authorized by the holder or by law to access the information contained in any database, whether in an individual record or linked to the identification of the holder.
- e. **Database:** Any organized set of personal data, which allows access to the data according to specific criteria, whatever the form or modality of its creation, storage, organization, and/or access.
- f. **Data processing:** Any operation or set of operations or technical procedure, whether or not automated, that allows the collection, storage, use, circulation and/or deletion of the data.
- g. **Holder of the Data:** Natural person holder of the data on which CANACOL ENERGY carries out any type of processing.

- h. Identifiable person:** Any person whose identity can be determined, directly or indirectly, by means of any information related to the person's physical, physiological, mental, economic, cultural, or social identity. A natural person shall not be considered identifiable if such identification requires disproportionate time or activities.
- i. Personal data:** Any information of a numerical, alphabetical, graphic, photographic, or acoustic type or of any other type that may be associated with one or more determined or determinable natural persons.
- j. Private data:** Such is the data that, due to its intimate nature, is only relevant to the holder of the information. The following is considered private data, among others: books of business persons, data contained in private documents, tastes or personal contact data.
- k. Processor:** Natural or legal person, public or private, or administrative body, that, alone or jointly with others, processes personal data on behalf of CANACOL ENERGY, as a result of the existence of a legal relationship that delimits the scope of its action for the provision of a service.
- l. Public data:** Data that is not semi-private, private, or sensitive. The following is considered public data, among others: data related to the marital status of persons, their profession or trade and their status as traders or public servants. Due to its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins and duly enforceable court judgments that are not subject to confidentiality.
- m. Responsible for the management of information:** Person or persons to whom CANACOL ENERGY has internally and formally assigned the function of coordinating and controlling the consultations or claims made by the holders.
- n. Responsible for the Processing:** The Companies, individually, are private and legal persons, which by themselves or in association with others, decide on the database and/or the processing of the data.
- o. Semi-private data:** Such is the data that is not of an intimate, reserved, or public nature and whose knowledge or dissemination may be of interest not only to their holder, but also to a certain sector or group of persons. Access to it is subject to some degree of restriction, such as financial, credit, academic, or labor data, among others.
- p. Sensitive data:** Sensitive data is understood as data that affects the privacy of the holder or whose improper use may generate discrimination, such as something that reveals racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, human rights organizations or organizations that promote the interests of any political party, or that supports the rights and guarantees of opposing political parties, as well as data related to health, sex life, and biometric data.
- q. Successor in Title:** Person who has succeeded or substituted another, the originator, through any legal title, in the right of another. The succession or substitution may have occurred by the act between living persons or by reason of death.
- r. Transfer:** Sending of personal data by CANACOL ENERGY from Colombia to a person Responsible for the Processing located inside (national transfer) or outside the country (international transfer).
- s. Transmission:** Processing of personal data that involves the communication of such data within (national transmission) or outside Colombia (international transmission), and that has as its purpose the performance of a processing by the processor on behalf of CANACOL ENERGY.

3. Principles Applicable to the Processing of Personal Datas

As a commitment of the Companies to the responsible processing of information, the actions and decisions adopted to achieve the common objectives are guided by the following principles:

1. **Principle of legality in matters of data processing:** The processing of information is a regulated activity that must be subject to the provisions of Law 1581 of 2012 and the other provisions that develop it.
2. **Principle of purpose:** The processing of CANACOL ENERGY's information obeys a legitimate purpose in accordance with the Constitution and the Law, which is informed to the holder.
3. **Principle of freedom:** The processing is carried out in accordance with the prior, express and informed consent of the holder of the data. The personal data of the holders are not obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves the consent.
4. **Principle of truthfulness or quality:** The information subject to processing by CANACOL ENERGY is truthful, complete, accurate, updated, verifiable, and understandable. In this respect, the holder plays a key role: it is understood that the information is truthful if the holder provides it in accordance with the principle of good faith.
5. **Principle of transparency:** The right of the holder to obtain from CANACOL ENERGY, at any time and without restrictions, information about the existence of data concerning the holder is guaranteed in the processing.
6. **Principle of access and restricted circulation:** The processing carried out by CANACOL ENERGY is subject to the limits that derive from the nature of the personal data, and from the provisions of Law 1581 of 2012 and the Constitution. In this sense, the processing is carried out by persons authorized by the holder.

Personal data, except for public information, is not available on the internet or other means of mass dissemination or communication, unless access it is technically controllable to provide restricted knowledge only to the holders or authorized third parties in accordance with Law 1581 of 2012.

7. **Principle of security:** The information processed by CANACOL ENERGY or its processors referred to in this Policy, will be handled with the technical, human, and administrative measures necessary to provide security to the records preventing their adulteration, loss, consultation, or unauthorized or fraudulent use or access.
8. **Principle of confidentiality:** All the human talent of CANACOL ENERGY involved in the processing of personal data that is not of a public nature has the obligation to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks that the processing comprises, being able to supply or communicate personal data only when such corresponds to the development of the activities authorized in this Policy or in Law 1581 of 2012.

4. Scope of Application

The guidelines and provisions contained in this Policy are applicable to the collection and processing of personal data that the Companies receive from the holders and that are recorded in any database that makes them susceptible to processing in Colombia.

Minors

The Processing of personal data of children and adolescents is prohibited, except in the case of data of a public nature, in accordance with the provisions of article 7 of Law 1581 of 2012 and when such processing complies with the following parameters and requirements:

1. That it responds to and respects the best interests of children and adolescents.
2. That it ensures respect for their fundamental rights.

Once the above requirements are met, the legal representative of the child or adolescent shall grant the authorization, prior to the exercise of the minor's right to be heard, opinion that will be assessed considering the maturity, autonomy, and capacity to understand the matter.

The Company will ensure the proper use of the same, complying with the principles and obligations established in Law 1851 of 2012 and Decree 1377 of 2013.

5. Authorization of the Holder

Subject to the exceptions established in Law 1581 of 2012, the Company must request the prior, express, and informed authorization from the holder to carry out the processing of the personal data of the holder or of the represented party, according to the purposes and terms established in this Policy, which may be obtained by any means that may be subject to subsequent consultation.

6. Purposes of the Processing

The purposes for which personal data is collected and the processing of the information of the holders is carried out are the following:

1. **Training:** Training for employees, contractors, suppliers, and other stakeholders.
2. **Miscellaneous purposes – Attention to citizens/customers (Management of Petitions, Complaints and Claims):** Processing of the different Petitions, Complaints, Claims, and Suggestions that may be filed.
3. **Miscellaneous purposes – Granting and management of permits, licenses, and authorizations:** Management of obligations for licenses and/or permits before the competent authorities.
4. **Miscellaneous purposes – Management of internal statistics:** Follow-up of the Company's operations and continuous improvement in processes, statistics on floating population in the Company's offices, internal studies of the behavior of the shareholder base.
5. **Miscellaneous purposes – Administrative procedures:** Control and follow-up of administrative processes, complaints; history of the Company's processes.
6. **Training:** Training events for employees, contractors, suppliers, and other stakeholders.
7. **Accounting, fiscal, and administrative management – Consultancies, audits, advice, and related services:** History for audits; control for internal audit.
8. **Accounting, fiscal, and administrative management – Inventory control:** Company inventory control. **Accounting, fiscal, and administrative management – Customer management:**

Management, control and follow-up of contracts and agreements with customers and/or suppliers; accounting control of the Company's customers.

9. **Accounting, fiscal, and administrative management – Collection and payment management:** Register of shareholders, suppliers, and others, for the transfer of dividends and other payments.
10. **Accounting, fiscal, and administrative management – Management of suppliers and contractors:** Control, management, and follow-up of the relationship with contractors and suppliers; verification, validation, prequalification, and management of supplier information; invitation to Companies to bidding processes, quotations, market surveys, direct negotiations, etc.; verification of compliance with requirements for contracting by the contractor; custody of contracts with suppliers.
11. **Accounting, fiscal, and administrative management – Fiscal management:** Control of compliance with tax obligations; support of monthly withholding at source made to stakeholders.
12. **Accounting, fiscal, and administrative management – History of commercial relationships:** History of customers.
13. **Accounting, fiscal, and administrative management – Requirement by control body – Private, sensitive, non-sensitive data:** Filing of marketing agreements; regulatory compliance with respect to the Financial Superintendent, the Superintendent of Companies, the Superintendent of Public Services, the Superintendent of Industry and Commerce, among others; updating of the Financial Superintendent's database of board members and legal representatives; preparation of ICA [Spanish acronym for Industry and Commerce Tax] returns; response to requests from the ANLA [Spanish acronym for National Environmental Licensing Authority]; responses to requests for information from regional and national authorities; and follow-up by the National Hydrocarbons Agency and Ecopetrol.
14. **Accounting, fiscal, and administrative management – Verification of data and references:** Logistics of attendance to events organized by the Company; professional contact information for the provision of services.
15. **Accounting, fiscal, and administrative management – Verification of legal, technical and/or financial requirements:** Information for corporate contacts, compliance with services contracted by the legal area, Information for corporate use (minutes, corporate documents, etc.), development and history of partners in projects, support of corporate documents.
16. **Technical and Administrative Management – Operational Development:** History and control of production and sales of natural gas and crude oil, transit control, proof of attendance to meetings organized with the respective localities for socialization of activities inherent to the operation, control of hydrocarbon easements, control over all processes of prior consultation that the Company has carried out, actual hydrocarbon delivery support, preservation of property life sheets by project.
17. **Employee Information:** Control of contractual relationship between employees and the Company.
18. **Justice – Judicial procedures:** Registration of occupational accident lawsuits, control and follow-up of judicial proceedings, criminal lawsuits, history of the Company's proceedings.
19. **Vulnerable population:** Control and contact with members of local and indigenous communities of each project.

20. **Human resources – Staff training:** Training for the Company's employees.
21. **Human resources – Payroll management:** Management and control of employee compensation, benefits, and social security information; control and history of the Company's payroll, analysis, identification, and verification of personnel working within the Company.
22. **Human resources – Personnel management:** Registration, control and management of employees hired by the Company; history of personnel reports.
23. **Human resources – Temporary work management:** Registration and control of temporary workers hired by the Company.
24. **Human resources – Social benefits:** Control of affiliations of employees to social security.
25. **Human resources – Prevention of occupational risks:** Control and follow-up of occupational risks and prevention.
26. **Human resources – Promotion and selection of personnel:** Guarantee the linking of personnel to the Company complying with the minimum requirements and current regulation.
27. **Security – Security and control of access to buildings:** Control of entry and exit of visitors to the facilities, control of entry of collaborators to the facilities, lists of physical security contractors, personal data of members of the Public Force.
28. **Work and social welfare – Labor relations and working conditions:** Control of attendance to training on occupational risks and prevention.

7. Rights of the Holders

The holders of personal data collected by CANACOL ENERGY have the right to:

- a. Know, update, and rectify their personal data, in case of partial, inaccurate, incomplete, fractioned or misleading data, or data whose processing is expressly prohibited or has not been authorized. For this purpose, it is necessary to previously establish the identification of the person in order to prevent unauthorized third parties from accessing the data to which they may not have access
- b. Request proof of the authorization granted to CANACOL ENERGY, except for the cases exempted by article 10 of Law 1581 of 2012.
- c. Know the use that CANACOL ENERGY has given to their personal data, upon request.
- d. File before the Superintendent of Industry and Commerce complaints for violations of the provisions of Law 1581 of 2012 and the other regulations that modify, add, or complement it.
- e. Revoke the authorization and/or request the suppression of personal data when the processing does not respect the constitutional and legal principles, or rights and guarantees. The revocation and/or suppression will proceed when the Superintendent of Industry and Commerce has determined that in the processing the person responsible for the treatment or the processor have incurred in conducts contrary to Law 1581 of 2012 and the Constitution.
- f. Access their personal data free of charge. The information requested by the holder may be provided by any means allowing the holder to know it, including digital data.

Regarding the last paragraph, the provisions of article 21 of Decree 1377 of 2013 must be observed, which determines:

“The Holder may consult his/her personal data free of charge: (i) at least once every calendar month, and (ii) whenever there are substantial modifications to the Information Processing Policies that motivate new consultations.

For consultations whose frequency is greater than one per each calendar month, the person responsible may only charge the holder for the costs of shipping, reproduction and, where appropriate, certification of documents. Reproduction costs may not exceed the costs of retrieving the corresponding material. For this purpose, the person responsible must demonstrate to the Superintendent of Industry and Commerce, when it may so require, the support for such expenses.”

The data holder may not, in any case, revoke the authorization and request the suppression of the data, when there is a legal or contractual duty that imposes on CANACOL ENERGY the obligation to keep them in the database.

The databases that store information of holders that have contractual relationships or that must remain by virtue of law, shall remain in force until the end of the need for the processing. The foregoing is without prejudice to the exercise of the rights of suppression that the holder has, with the exceptions indicated in the previous chapter.

8. Procedures for the Exercise of Rights by Holders

The law has defined two ways to exercise rights: consultations and claims.

a. Consultations

The consultation mechanism must be used to file requests for personal information of the holder contained in any database of the Company. Consultations will be answered within a maximum period of ten (10) business days from the day following the date of receipt thereof.

When it is not possible to answer the consultation within that term, the interested party will be informed of the reasons, indicating the new date on which the consultation will be resolved, which **will not be more than five (5) working days after the expiration of the first term.**

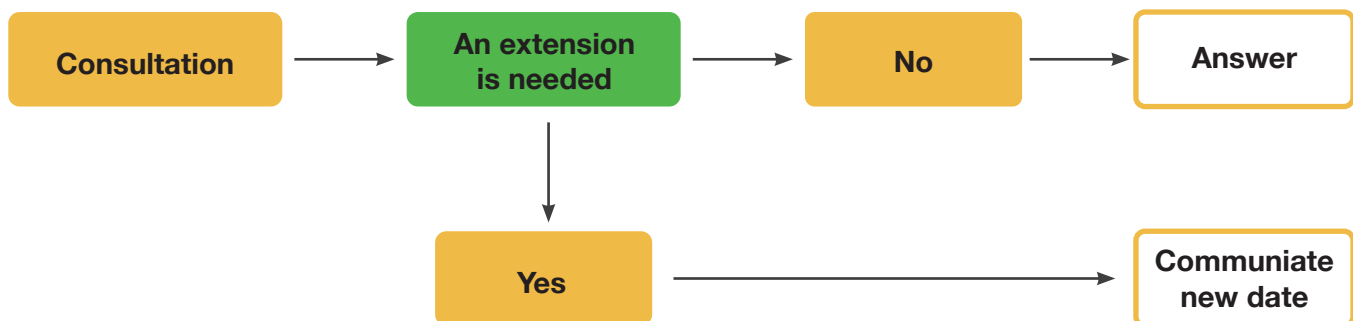


Figure 1. Consultation procedure

b. Claims

Los reclamos serán atendidos en un término máximo de quince (15) días hábiles contados a partir del día siguiente a la fecha de recibo del mismo. CANACOL ENERGY podrá prorrogar el término de respuesta en casos especiales dando aviso al interesado. Este nuevo plazo **no superará los ocho (8) días hábiles siguientes al vencimiento del primer término.**

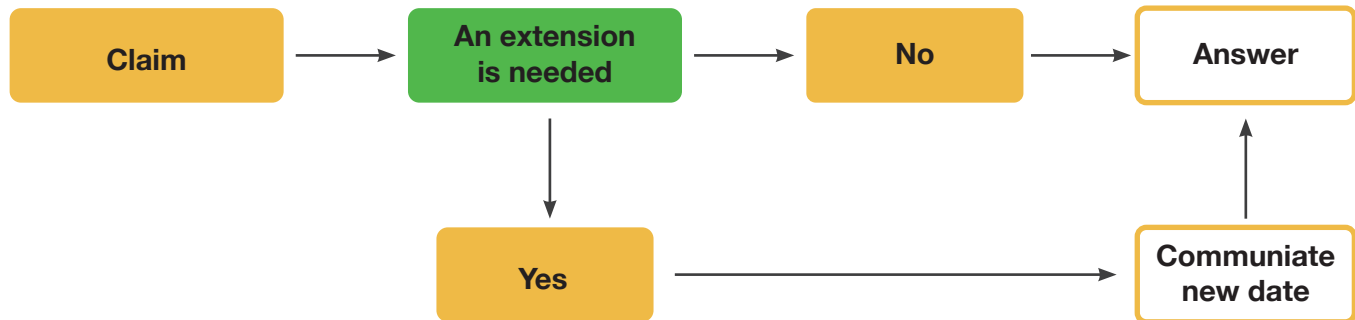


Figure 2. Claim procedure

Channels available to receive consultations or claims

CANACOL ENERGY has an information area designed to ensure proper attention to the requirements of the holders, especially consultations and claims related to data protection, to guarantee the exercise of the rights contained in the Constitution and Law 1581 of 2012.

The holders of personal data may present their consultations and claims as follows:

1. By e-mail sent to: canacol.sgdp@canacolenergy.com or cne.sgdp@canacolenergy.com
2. Through the independent whistleblowing hotline: <https://resguarda.com/canacolenergy>

The previous channel has personnel trained for the performance of their functions, as well as the necessary control systems so that any new personal information requested by the holders may be documented and may be subject to verification.

However, it must be noted that CANACOL ENERGY will only send personal data in connection with the consultation or claim to the following persons

1. To the holder of the data, the holder's successors in title or legal representatives, if they prove these qualifications as mentioned in the section of definitions of this document.
2. To the persons authorized by the holder of the data.
3. To the persons authorized by court or legal order.

In the latter case, the Decision C-748 of 20111 of the Constitutional Court, regarding requests for information from public or administrative entities, must be heeded:

- First, the public or administrative entity must justify its request indicating the link between the need to obtain the data and the fulfillment of its constitutional or legal functions.
- Secondly, with the delivery of the information, the public or administrative entity will be informed that it has the duty to comply with the obligations and requirements imposed by Law 1581 of 2012, as Responsible for the Processing of data, or Processor in certain cases. The receiving administrative entity must comply with all the legal mandates that exist on the subject on the date of receipt of the information, especially the principles of purpose, legitimate use, restricted circulation, confidentiality, and security.

When a consultation or claim is filed, the following must be taken into account:

At the time of filing the request, it must be addressed to CANACOL ENERGY and must have at least the following information:

- Contain the identification of the holder (name and identification document).
- Contain the description of the facts generating the consultation or claim.
- Include the subject matter of the request.
- Specify the notification address of the holder, physical or digital (e-mail).¹

If the request involves information of a minor, or it is the minor who raises or files the request, CANACOL ENERGY will process it by informing the adult(s) (parents, representatives or guardians of the minor), who must authorize the processing and delivery of the information.

Authorization to third parties

The holder must deliver to CANACOL ENERGY by e-mail the due authorization in which the holder empowers a third party to consult, update or rectify the holder's information. This requirement has the sole purpose of protecting and restricting access to the information to unauthorized third parties.

If the request for information involves information of a minor, or it is the minor who raises or files the request, CANACOL ENERGY will process it by informing the adult(s) (parents, representatives or guardians of the minor), who must authorize the processing and delivery of the information.

This authorization must contain at least the following:

- a. Identification of the authorizing holder.
- b. Copy of the citizenship card or identification document of the holder.
- c. Name and identification data of the authorized person.
- d. Time for which the person can consult, update or rectify the information (only once, for one year, for the duration of the legal relationship or until further notice, etc.).
- e. Voluntary and free nature of the authorization.

1. If the holder does not have an electronic address, the answer will be sent in physical medium.

9. Image Capturing

What is video surveillance?

Video surveillance is considered to be any activity that involves the placement of a recording camera, fixed or mobile, with the purpose of ensuring the security of a physical facility or of people, ensuring the correct performance of tasks in the work environment or being useful in various fields.

A video surveillance system is composed, basically, of an image capturing element (for example, a camera), a display element (for example, a screen) and a storage element (for example, a hard drive).

For the captured image to be used immediately or at a later time, it must be transmitted to the display element and to the storage element, respectively.

For what purpose does CANACOL ENERGY use video surveillance?

CANACOL ENERGY may use various means of video surveillance in different internal and external sites of its offices, administrative headquarters and/or fields. This is why we inform of the existence of these mechanisms by disseminating video surveillance announcements in visible places, all strategically located for easy identification. Our video surveillance system does not inspect areas where the privacy of the holder prevails (such as restrooms or private areas).

The system is used to ensure the safety of the property, facilities, and the people in them. This information may be used as evidence in any type of proceedings before administrative or judicial authorities, subject to and in compliance with the applicable regulations.

11. Validity of the Information Processing Policy

This Policy is effective as of the month of September of 2017 and was last modified on March 1, 2022.

12. Notification of Changes to the Information Processing Policy

The Company may modify this Policy at its discretion. Any substantial change or modification will be communicated to the holders through the website <https://canacolenergy.com/>.