



We Love to Help S.A.S.

PRIVACY POLICY & PERSONAL INFORMATION



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PRIVACY POLICY & PERSONAL INFORMATION INTRODUCTION

With the clarity of the importance of the protection of personal information provided by the owners of the same, **WE LOVE TO HELP S.A.S.** hereinafter **ROCKSTAR ROADIES**, as responsible for the information, has designed and established the following privacy policy and treatment of personal information and the procedures through which it is intended to achieve a responsible, safe and adequate use of the information.

The foregoing taking into consideration what is stated in the Political Constitution in its article 15 in which the fundamental right to habeas data is developed; which is the right of all people to know, update and rectify all the information about them that is found in public or private databases. Unquestionably, it directly touches on the treatment and protection of personal and private data of individuals, therefore, **Rockstar Roadies** as responsible for personal information in accordance with the provisions of Statutory Law 1581 of 2012 and Regulatory Decree 1377 of 2013 proceeds to issue this privacy and personal information processing policy, which is mandatory for **Rockstar Roadies**, its representatives, administrators, workers, contractors and third parties with whom **Rockstar Roadies** establishes any relationship.

IDENTIFICATION OF THE RESPONSIBLE AND IN CHARGE OF THE TREATMENT OF PERSONAL INFORMATION:

RESPONSIBLE NAME:	WE LOVE YOUR HELP SAS – ROCKSTAR ROADIES
NIT (USA: EIN)	901.584.198-3
ADDRESS:	Carrea 43 No. 19-17 Floor 15 – Business Center Block, Poblado, Medellín.
Email:	office@rockstarroadies.com

OBJECT

The objective of the Privacy Policy and treatment of personal information is to promote the assurance and protection of the personal information of administrators, workers, contractors, third parties and others legally obtained by the company and with respect to which **Rockstar Roadies** is responsible for compliance with company guidelines. The protection of personal information is done under criteria of responsibility and high standards of security and custody of information.

DEFINITIONS

- **Authorization:** Prior, express and informed consent of the owner of the data to carry out the treatment. This can be written, verbal or through unequivocal behaviors that allow a reasonable conclusion that the owner granted authorization.
- **Database:** It is the organized set of Personal information that are subject to treatment, electronic or not, whatever the modality of its formation, storage, organization and access.
- **Consultation:** Request from the owner of the data or from the persons authorized by it or by law to know the information that rests on it in databases or files.
- **Personal information:** Any information linked or that can be associated with one or more specific or determinable natural persons. These data are classified as sensitive, public, private and semi-private.
- **Sensitive personal information:** Information that affects the privacy of the person or whose improper use can generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, of human rights or that promotes the interests of any political party or that guarantees the rights and guarantees of opposition political parties, as well as data related to health, sexual life and biometric data (fingerprints, among others).

For the purposes of this policy and in case of eventual request and consultation, the company acknowledges that the provision of personal information is optional and voluntary and is the property of the owner of the information.

- **Public personal information:** It is the data classified as such according to the mandates of the law or the Political Constitution and all those that are not semi-private or private. Public, among others, are the data contained in public documents, public records, official gazettes and bulletins and duly executed judicial sentences that are not subject to reservation, those related to the marital status of people, their profession or trade and their quality of merchant or public servant. The personal information existing in the commercial registry of the Chambers of Commerce are public (Article 26 of the C.Co.).

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Likewise, public data is that which, by virtue of a decision of the owner or a legal mandate, is found in files of free access and consultation. These data can be obtained and offered without reservation and regardless of whether they refer to general, private or personal information.

- **Private personal information.** It is the data that, due to its intimate or reserved nature, is only relevant for the person who owns the data. Examples: merchants' books, private documents, information extracted from the home inspection.
- **Semi-private personal information.** Data that is not of an intimate, reserved, or public nature and whose knowledge or disclosure may be of interest not only to its owner but to a certain sector or group of people or to society in general, such as, among others, data regarding compliance and breach of financial obligations or data relating to relations with social security entities.
- **Responsible for the Treatment:** Person who by himself or in association with others, decides on the database and/or the treatment of the data.
- **in charge of the treatment:** Person who performs the data processing on behalf of the person responsible for the treatment.
- Being **"Authorized"** is Rockstar Roadies and all the people under its responsibility, who by virtue of the authorization and the Policy have the legitimacy to submit the owner's personal information to treatment. The Authorized includes the gender of the Authorized.
- **"Enabling"** or being **"Enabled"**, is the legitimacy that expressly and in writing through a contract or document that takes its place, grants Rockstar Roadies to third parties, in compliance with the applicable law, for the processing of personal information, making such third parties responsible for the processing of personal information delivered or made available.
- **Claim:** Request from the owner of the data or the persons authorized by it or by law to correct, update or delete their personal information or when they notice that there is an alleged breach of the data protection regime, according to article Art. 15 of the Law 1581 of 2012.
- **Owner of the data:** It is the natural person to whom the information refers.
- **Treatment:** Any operation or set of operations on personal information such as, among others, the collection, storage, use, circulation or deletion of that kind of information.
- **Transmission:** Treatment of personal information that implies the communication of the same within (national transmission) or outside of Colombia (international transmission) and whose purpose is to carry out a treatment by the person in charge on behalf of the person in charge.
- **Transfer:** The transfer of data takes place when the person in charge and/or in charge of the treatment of personal information, located in Colombia, sends the information or personal information to a receiver, who in turn is responsible for the treatment and is inside or outside Colombia. from the country.
- **Procedural requirement:** The owner or successor in title may only file a complaint with the Superintendence of Industry and Commerce once they have exhausted the consultation or claim process before the person responsible for the treatment or in charge of the treatment, the foregoing according to Article 16 of Law 1581 of 2012.

PRINCIPLES FOR THE PROCESSING OF PERSONAL INFORMATION

The processing of personal information must be carried out in compliance with the general and special regulations on the matter and for activities permitted by law. Consequently, the following principles apply for the purposes of this policy:

- **Principle of legality:** Data processing is a regulated activity that must be subject to the provisions of the law and the other provisions that develop it.
- **Principle of purpose:** The treatment must obey a legitimate purpose in accordance with the Constitution and the Law.
- **Principle of freedom:** The treatment can only be exercised with the prior, express and informed consent of the owner. Personal information may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves consent.
- **Principle of veracity or quality:** The information subject to treatment must be truthful, complete, exact, updated, verifiable and understandable. The treatment of partial, incomplete, fragmented or misleading data is prohibited.
- **Principle of transparency:** In the treatment, the right of the owner to obtain from the person in charge of the treatment, at any time and without restrictions, information about the existence of data that concerns him or her must be guaranteed.



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- **Principle of access and restricted circulation:** The treatment is subject to the limits derived from the nature of the personal information, the provisions of the law and the Constitution. In this sense, the treatment can only be done by persons authorized by the owner and/or by the persons provided for by law.
- **Security principle:** The information subject to Treatment by the person in charge of the Treatment or in Charge of the Treatment referred to in this law, must be handled with the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, unauthorized or fraudulent loss, consultation, use or access.
- **Confidentiality principle:** All persons involved in the processing of personal information that are not of a public nature are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks that the processing comprises, and may only Carry out supply or communication of personal information when this corresponds to the development of the activities authorized in this law and in the terms thereof.

Any new project within the Organization that involves the Processing of Personal information must be consulted with the Legal Department of the company, which is the person and unit in charge of the data protection function to ensure compliance with the policy and the necessary measures to maintain the confidentiality of personal information.

RIGHTS OF THE HOLDERS

The Owner of the personal information will have the following rights:

- a) Know, update and rectify your personal information in front of those responsible for the Treatment or in Charge of the Treatment. This right may be exercised, among others, against partial, inaccurate, incomplete, fragmented, misleading data, or those whose Treatment is expressly prohibited or has not been authorized;
- b) Request proof of the authorization granted to the person responsible for the Treatment except when expressly excepted as a requirement for the Treatment, in accordance with the provisions of the article of this law;
- c) Be informed by the person in charge of the Treatment or the Person in Charge of the Treatment, upon request, regarding the use that has been given to their personal information;
- d) Submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of this law and the other regulations that modify, add or complement it;
- e) <Literal CONDITIONALLY exequible> Revoke the authorization and/or request the deletion of the data when the principles, rights and constitutional and legal guarantees are not respected in the Treatment. The revocation and/or suppression will proceed when the Superintendence of Industry and Commerce has determined that in the Treatment the person in charge or in Charge has incurred in conduct contrary to this law and the Constitution;
- f) Free access to your personal information that has been processed.

INFORMATION AND PERSONAL INFORMATION COLLECTED

The data and/or personal information that Rockstar Roadies collects from the owner of the information are the following:

1. **Types of people:**

- a. **Natural:** names and surnames, type of identification, identification number, gender, marital status and date of birth, email, financial data (bank accounts).
- b. **Legal:** company's name, NIT (USA-EIN), address, telephone, cell phone, email, country, city, financial data (bank accounts).

Information necessary to provide services, including preferences such as travel class, passenger names and surnames (type of document, document number, date of birth, name, surname, gender, email, nationality, passport expiration date), contacts for cases of accident or any other anomaly (names and surnames, telephone).

2. **Cardholder data:** type of document, document number, telephone, address, email, names, card number, expiration date and bank.
3. **Quotation request:** names, surnames, telephone numbers, city and email.
4. **Travel information:** type of request, destination, departure date, duration, number of adults, number of children, hotel category, food, additional services, transportation service, budget per person.
5. **Claim request:** names, surnames, identification number, address, telephone numbers, city, email and comments.
6. **Report of technical problems:** names, surnames, address, telephone numbers, city, email and comments.



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- 7. Biometric data:** images, video, audio, fingerprints that identify or make identifiable our clients, users or any person who enters or is or travels in any place where the company has implemented devices to capture said information.

These data can be stored and/or processed on servers located in data processing centers, whether owned or contracted with providers, located in different countries, which is authorized by our clients/users, by accepting this treatment and protection policy. of personal information.

Rockstar Roadies reserves the right to improve, update, modify, delete any type of information, content, domain or subdomain that may appear on the website, without prior notice, being understood as sufficient with the publication on the websites. by Rockstar Roadies. For the solution of legal or internal requests and for the provision or offer of new services or products.

TREATMENT, SCOPE AND PURPOSES.

Rockstar Roadies informs the holders that the data collected from our clients, contractors and suppliers may be used for the following purposes. The treatment can be carried out by Rockstar Roadies directly or through its contractors, consultants, advisors and/or third parties in charge of processing personal information, to carry out any operation or set of operations such as collection, storage, use, circulation, deletion, classification, transfer and transmission (the "Processing") of all or part of your personal information:

1. Access and consult your personal information (private, semi-private, sensitive or reserved) that reside or are contained in databases or files of any Public or Private Entity, whether national, international or foreign.
2. Provide, share, send or deliver your personal information necessary for the purposes of fraud prevention and control, risk selection, conducting studies and in general the administration of information systems.
3. Execute the existing contractual relationship with its suppliers, workers, service providers, natural and legal persons.
4. Affiliation, transfer and identification.
5. Update of data delivered by workers, suppliers, service providers, natural and legal persons.
6. Authorization for access to the services offered by the Entity.
7. Respond to control entry requirements.
8. Evaluation of service opportunity and quality indicators.
9. Evaluation of the quality of the products, procedures and services offered by Rockstar Roadies, which may be made by any of the means of contact informed by the owner of the information in their hiring or affiliation process.
10. To send information, through mail, text messages (SMS and/or MMS) or any other means of communication about the status, duties and rights of suppliers, service providers, natural and legal persons.
11. Provision of information to the competent authorities if required.
12. For any other purpose derived from the legal nature of Rockstar Roadies.
13. Develop the selection, evaluation and employment process.
14. Support internal or external audit processes.
15. Register the information of employees and/or pensioners (active or inactive) in the databases of Rockstar Roadies.
16. Provide, share, send, deliver the personal information of the owner to companies affiliated or linked to Rockstar Roadies located in Colombia or any other country in the event that said companies require the information for the purposes indicated here
17. Regarding the data collected directly at the security points, taken from the documents that people provide to the security personnel and obtained from the video recordings that are made inside or outside the facilities of Rockstar Roadies, these will be used for security purposes of people, goods and facilities of Rockstar Roadies and may be used as evidence in any type of process. If a personal information is provided, said information will be used only for the purposes indicated here, and, therefore, the Rockstar Roadies, will not proceed to sell, license, transmit, or disclose it, unless: there is express authorization to do so; is necessary to allow contractors or security agents to provide the services entrusted; is necessary in order to provide our services and/or products; or is required or permitted by law.
18. Carry out the processing of your personal information directly or through a person in charge of the Treatment, located in Colombia or any other country to whom your personal information will be supplied through transmission, national and international transfers as the case may be, to carry out the treatment on behalf of Rockstar Roadies.



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Likewise, Rockstar Roadies will provide personal information to suppliers of products and services, to third parties that provide services or with whom it has some type of relationship, either for:

- Collection.
- Payment.
- Customer service.
- Database management and administration.
- Request, contract, change and cancel services provided by Rockstar Roadies directly or through third parties.
- Respond to requests, complaints and resources.
- Give answers to control organisms.
- Request invoice or information about it.
- Receive print or electronic advertising.
- Use the different services of their corresponding websites, including downloading content and formats.
- Send the owner notification of offers, notices and/or promotional messages, satisfaction surveys regarding the goods and services of Rockstar Roadies; provide your contact information to insurance intermediaries, external lawyers, marketing companies, call centers and telemarketing companies, among others, for the intended purposes.
- Process payments.
- Collect portfolio and carry out prejudicial and judicial administrative collection.
- Attention services (user attention channels).
- Authentication and validation of emails.
- Telemarketing.
- Mass marketing products.
- Electronic billing.
- Marketing of different types of products.
- Transfer or transmit your data nationally and internationally for the processing of your personal information, through an outsourcing service.
- Know and store the geographical location to carry out measurements and studies.
- Any other activity of a similar nature to those described in the aforementioned subsections.

NATIONAL OR INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

Rockstar Roadies may carry out the transfer of data to other data controllers when authorized by the owner of the information or by law or by an administrative or judicial mandate.

INTERNATIONAL AND NATIONAL TRANSMISSION OF DATA TO MANAGERS

Rockstar Roadies may send or transmit data to one or more managers located inside or outside the Republic of Colombia in the following cases: a) When authorized by the owner and b) when, without authorization, there is between the person in charge and the person in charge a data transmission contract.

DUTIES OF THE DATA CONTROLLER

- Guarantee the holder, at all times, the full and effective exercise of the right of habeas data.
- Request and keep, under the conditions provided for in this law, a copy of the respective authorization granted by the owner.
- Duly inform the owner about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Process queries and claims formulated in the terms indicated in this law.
- Adopt an internal manual of policies and procedures to guarantee adequate compliance with this law and, in particular, for dealing with queries and claims.
- Inform at the request of the owner about the use given to their data.



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- Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the holders.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

DUTIES OF THOSE IN CHARGE OF TREATMENT

- Guarantee the holder, at all times, the full and effective exercise of the right of habeas data.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Carry out timely updating, rectification or deletion of data under the terms of this law.
- Update the information reported by those responsible for treatment within five (5) business days from its receipt.
- Process queries and claims made by the owners in the terms set forth in this law.
- Adopt an internal manual of policies and procedures to guarantee adequate compliance with this law and, in particular, for the attention of queries and claims by the owners.
- Refrain from circulating information that is being controversial by the owner and whose blocking has been ordered by the Superintendency of Industry and Commerce.
- Allow access to information only to people who can have access to it.
- Inform the superintendence of industry and commerce when there are violations of the security codes and there are risks in the administration of the information of the holders.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

PETITIONS, COMPLAINTS AND CLAIMS

The following channels are enabled whose purpose is the reception of requests, petitions, complaints, queries and claims of personal information processing, Rockstar Roadies enables the email oficina@rockstarroadies.com to channel, study, coordinate and respond to requests, petitions, complaints, queries and claims. Requests may be sent to said email address, which will be processed in accordance with the provisions of Statutory Law 1581 of 2012 and Regulatory Decree 1377 of 2013:

- **Queries:** The holders or their successors in title may consult the personal information of the holder that rests in our database. Rockstar Roadies will provide them with all the information contained in the individual record or that is linked to the identification of the owner. The query will be answered within a maximum term of ten (10) business days from the date of receipt of the query. When it is not possible to attend the query within said term, the interested party will be informed, and the date on which their query will be attended to will be indicated, which in no case may exceed five (5) business days following the expiration of the first term.
- **Claims:** The owner or his successors in title who consider that the information contained in a database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the law, may file a claim with Rockstar Roadies, which will be processed under the following rules:
 - The claim will be made by request addressed to Rockstar Roadies with the identification of the holder, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert. If the claim is incomplete, Rockstar Roadies will require the interested party within five (5) days after receiving the claim to correct the faults. After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.
 - Once the complete claim is received, a legend will be included in the database that says "claim in process" and the reason for it, in a term not exceeding two (2) business days. Said legend must be kept until the claim is decided.
 - The maximum term to address the claim will be fifteen (15) business days from the day following the date of receipt. When it is not possible to address the claim within said term, the interested party will be informed and the date on which their claim will be addressed will be indicated, which in no case may exceed eight (8) business days following the expiration of the first term.
 - In any case, the owner or successor in title may only file a complaint with the Superintendence of Industry and Commerce once the consultation or claim process has been exhausted before Rockstar Roadies.
 - The area responsible for receiving and processing claims is the Legal area.



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- The request for deletion of the information and the revocation of the authorization will not proceed when the owner has a legal or contractual duty to remain in the database.

QUESTIONS OR SUGGESTIONS

Questions or inquiries about the process of collecting, processing or transferring your personal information, or consider that the information contained in a database should be corrected, updated or deleted, please send us a message to the following email account: office@rockstarroadies.com

For more information about Rockstar Roadies, the identity, address and forms of contact can be consulted at the following address office@rockstarroadies.com. This website has with itself the terms and conditions applicable to the services and products published, which can be consulted at any time for more information.

VALIDITY

Rockstar Roadies reserves the right to modify this policy to adapt it to new legislation or jurisprudence, as well as good practices in the tourism sector and other sectors of the economy that are part of the business group. In such cases, Luxus Colombia will announce the changes introduced on this page reasonably in advance of their implementation.

This policy was modified and posted on the Luxus Colombia's Website on June 30, 2022 and is effective from the date of publication. The last update was made on September 20, 2022.

Medellin, September 20, 2022

DANIEL LOPERA RENDON
Manager and Legal Representative
WE LOVE HELP SAS – LUXUS COLOMBIA