



POLICIES AND PROCEDURES FOR THE PROCESSING OF PERSONAL DATA

CHAPTER I – GENERAL PROVISIONS

1. GENERAL PRINCIPLES AND TENETS

TEXTILES LAFAYETTE S.A.S, hereinafter LAFAYETTE, recognizes the importance and guarantees the protection of the right to Habeas Data, privacy, good name, image and autonomy of individuals. For this purpose, all actions will be governed by the principles of good faith, legality, self-determination, freedom and transparency.

Whomever, in the exercise of any activity, whether commercial and/or work related, whether permanent or occasional, provides any information or personal data to Lafayette and in which it acts as Data Processor or Data Controller may know, update, rectify and revoke such information.

2. LEGAL FRAMEWORK

Political Constitution, Article 15. Law 1266 of 2008.

Law 1581 of 2012.

Regulatory Decrees 1727 of 2009 and 2952 of 2010, and Partial Regulatory Decree No 1377 of 2013.

Constitutional Court Judgments C – 1011 of 2008, and C - 748 of 2011.

3. DEFINITIONS

In accordance with the current legislation on the subject, the following definitions are established:

- Authorization: Prior, express and informed consent of the Data Owner to carry out the treatment of personal data.
- Database: Organized set of personal data that is subject to processing.
- Personal data: Any information linked to or that may be associated with one or several determined or determinable natural persons.
- Private data: the data that by its private or reserved nature is only relevant to the Data Owner.

- Data Processor: Natural or legal person, public or private, that by itself or in association with others, performs the processing of personal data on behalf of the Responsible for the treatment.
- Data Controller: Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the treatment of the data.
- Owner: Natural person whose personal data is subject to treatment.
- Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

4. SPECIFIC PRINCIPLES

LAFAYETTE will apply the following specific principles that are established below, which constitute the rules to follow in the collection, handling, use, processing, storage and exchange of personal data:

- a) Principle of legality: In the use, capture, collection and processing of personal data, will be applied to the current and applicable provisions governing the processing of personal data and other related fundamental rights.
- b) Principle of freedom: The use, capture, collection and processing of personal data can only be carried out with the prior, express and informed consent of the Data Owner. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal, statutory, or judicial mandate that relieves consent.
- c) Principle of purpose: The use, capture, collection and processing of personal data to which LAFAYETTE has access and collects, will be subordinated and serve a legitimate purpose, which must be informed to the respective personal data Owner.
- d) Principle of truth or quality: The information subject to use, capture, collection and processing of personal data must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.
- e) Principle of transparency: The use, capture, collection and processing of personal data must guarantee the right of the Data Owner to obtain from LAFAYETTE, at any time and without restrictions, information about the existence of any type of information or personal data that be of their interest or ownership.
- f) Principle of access and restricted circulation: Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication, unless the access is technically controllable to provide restricted knowledge only to the Data Owners or authorized third parties. For these purposes LAFAYETTE's obligation will be of means.
- g) Principle of security: The personal data and information used, captured, collected and subject to processing by LAFAYETTE, will be subject to protection to the extent

that technical resources and minimum standards so permit, through the adoption of technological protection measures, protocols, and all types of administrative measures that are necessary to grant security to the electronic registries and repositories, avoiding their adulteration, modification, loss, consultation, and in general against any unauthorized use or access.

h) Principle of confidentiality: Each and every one of the persons who administer, manage, update or have access to information of any kind that is in databases or databanks, undertake to keep it strictly confidential and not disclose it to third parties, all personal, commercial, accounting, technical, commercial or any other information provided in the execution and exercise of their functions. All persons who currently work or are hired in the future for this purpose, in the administration and management of databases, must subscribe an additional document(s) or attachment(s) to their employment or services provision contract in order to ensure such commitment. This obligation persists and is maintained even after the end of their relationship with any of the tasks involved in the Processing.

5. SENSITIVE DATA

Sensitive data is understood to be any data that affects the Data Owner's privacy or whose improper use can generate discrimination, such as that revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or data promoting the interests of any political party or that protects the rights and guarantees of opposition political parties as well as data related to health, sexual life and biometric data, among others, the capturing of still or moving images, fingerprints, photographs, iris, voice recognition, facial or palm, etc.

5.1. PROCESSING OF SENSITIVE DATA

Data classified as sensitive may be used and processed when:

a) The Data Owner has given their explicit authorization to said processing, except in the cases that the granting of said authorization is not required by law.

b) The Processing is necessary to safeguard the vital interest of the Data Owner and they are physically or legally incapacitated. In such events, the legal representatives must grant their authorization.

c) The Processing is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other non-profit organization, whose purpose is political, philosophical, religious or union, provided they refer exclusively to its members or to people who maintain regular contact due to their purpose. In such events, the data cannot be provided to third parties without the Data Owner's authorization.

d) The Processing refers to any data that is necessary for the recognition, exercise or defense of a right in a judicial process.

e) The Processing has a historical, statistical or scientific purpose. In such event, measures leading to the suppression of Owners' identity must be adopted.

5.2. OWNER'S AUTHORIZATION.

Notwithstanding the exceptions provided for in the law, prior, express and informed authorization by the Data Owner must be obtained for the processing, which must be obtained by any means that may be subject to further consultation and verification.

5.3. CASES IN WHICH AUTHORIZATION IS NOT REQUIRED

Authorization by the Data Owner will not be necessary in the case of:

- a) Information required by a public or administrative entity in the exercise of its legal functions or by judicial order.
- b) Data of public nature.
- c) Medical or health emergency cases.
- d) Processing of information authorized by law for historical, statistical or scientific purposes.
- e) Data related to the Civil Registry of Persons.

6. MINORS RIGHTS

In the Processing of data, respect for the prevailing rights of minors will be ensured.

The processing of personal data of minors is prohibited, except for data that is of public nature.

It is the responsibility of the State and educational entities of all kinds to provide information and train legal representatives and guardians about the possible risks faced by minors regarding the improper processing of their personal data, and to provide knowledge about responsible and secure use on the part of minors of their personal data, their right to privacy and protection of their personal information, and that of others.

CHAPTER II. RIGHTS AND DUTIES.

7. RIGHTS OF DATA OWNERS

The Personal Data Owner will have the following rights:

- a) To know, update and rectify their personal data with TEXTILES LAFAYETTE S.A.S. This right may be exercised, among others, regarding 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 TEXTILES LAFAYETTE S.A.S;
- c) Be informed by TEXTILES LAFAYETTE S.A.S., upon request, regarding the use given to their personal data;
- d) Submit complaints to the Superintendence of Industry and Commerce for any infringements of the provisions of Law 1581 of 2012 and this manual, after exhaustion of the claims procedure established in this document;
- e) Revoke the authorization and/or request the deletion of the data when the principles, rights and constitutional and legal guarantees are not respected during the Processing.
- f) Access free of charge their personal data subjected to Processing.

8. DUTIES OF TEXTILES LAFAYETTE S.A.S

As the Personal Data Controller, LAFAYETTE accepts and acknowledges that such data belong solely and exclusively to their Owners and that only they can dispose of them, which is why the company will only use them in compliance with currently existing legislation. LAFAYETTE undertakes to comply with the following duties:

- a) Guarantee to the Data Owner, at all times, the full and effective exercise of the right to habeas data;
- b) Keep a copy of the respective authorization granted by the Data Owner;
- c) Properly inform the Data Owner about the purpose of the collection and the rights they are entitled to by virtue of the authorization granted;
- d) Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access;
- e) Process inquiries and claims made by the Data Owners in the terms indicated by Articles 14 and 15 of Law 1581 of 2012;
- f) Inform at the Data Owner's request about the use given to their data;
- g) Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the Owners' data.
- h) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.
- i) Insert in the database the legend "Data under judicial discussion" once notified by the competent authority of any judicial processes related to the quality or details of the personal data;
- j) Refrain from circulating data that is being disputed by the Data Owner and whose blockade has been ordered by the Superintendence of Industry and Commerce;

k) Allow data access only to people who are authorized to access it.

l) Inform through its website the new mechanisms it implements so that data Owners may exercise their rights effectively.

9. NATIONAL DATABASE REGISTRY

LAFAYETTE, will proceed in accordance with the current regulations issued by the National Government for this purpose, to register its databases, before the National Database Registry (RNBD), administered by the Superintendence of Industry and Commerce. The RNBD is the public directory of databases subject to Processing that operate in the country, and which will be of free consultation for citizens, in accordance with the regulations issued by the National Government for this purpose.

10. AUTHORIZATION

The collection, storage, use, circulation or deletion of personal data by LAFAYETTE, requires the free, prior, express and informed consent of the data Owner. LAFAYETTE, as the Personal Data Controller, has provided the necessary mechanisms to obtain the authorization of the Data Owners, guaranteeing in any case that it is possible to verify the granting of such authorization.

10.1. MECHANISMS FOR GRANTING AUTHORIZATION

Authorization can be granted verbally and/or recorded in a physical, electronic or any other format that allows to guarantee its subsequent consultation, or through a suitable technical or technological mechanism through which it can be reasonably concluded, that without the Data Owner's action their data would not have been stored in the database.

With the granting of the authorization, the personal data Owner knows and accepts that LAFAYETTE will collect and use the data for the purposes that they inform it prior to the granting of the authorization. In the authorization requested by LAFAYETTE, it will be established: (i) what data is collected and who collects it; (ii) the purpose of the data processing; (iii) The rights of access, correction, updating or deletion of personal data provided by the Data Owner and, (iv) if any sensitive data is being collected.

10.2. PROOF OF AUTHORIZATION

LAFAYETTE will adopt measures to keep records of when and how it obtained authorization from the Personal Data Owners for the treatment thereof. LAFAYETTE will use the mechanisms that it currently has, and will implement and adopt the necessary actions to maintain records or suitable technical or technological mechanisms for when and how it obtained authorization from the Personal Data Owners for the treatment thereof. To comply with the above, physical files or electronic repositories made directly or through third parties hired for that purpose may be established.

11. PRIVACY STATEMENT

The Privacy Statement is the physical document, electronic or in any other known or unknown format, which is made available to the Data Owner for the processing of their personal data. Through this document the Data Owner is informed about the existence of the information processing policies that will be applicable to them, the way to access them and the characteristics of the processing that the personal data will subject to.

11.1. SCOPE AND CONTENT OF THE PRIVACY STATEMENT

The Privacy Statement, as a minimum, must contain the following information:

a) The identity, address and contact information of the Personal Data Controller. b) The type of processing to which the data will be subjected and the purpose thereof. c) The general mechanisms provided by the Controller so that the Data Owner knows the data processing policy and any substantial changes made to it. In all cases, the Data Owner must be informed how to access or consult the data processing policy.

12. PREROGATIVES AND OTHER RIGHTS OF DATA OWNERS

In attention to and in accordance with the provisions of current and applicable regulations on the protection of personal data, the Personal Data Owner has the following rights:

a) Access to, know, rectify and update any personal data with LAFAYETTE, in its capacity as Data Controller.

b) By any valid means, request proof of the authorization granted to LAFAYETTE, in its capacity as Data Controller.

c) Receive information from LAFAYETTE, upon request, regarding the use that has been given to the personal data.

d) Go before the legally constituted authorities, especially before the Superintendence of Industry and Commerce, and submit complaints for violations of the provisions of the current applicable regulations, prior consultation procedure or requirement before the Data Controller.

e) Modify and 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 in force.

f) Have knowledge of and free access to the personal data subjected to Processing.

13. DUTIES OF LAFAYETTE IN RELATION TO THE PROCESSING OF PERSONAL DATA

LAFAYETTE, will keep in mind, at all times, that the personal data is property of the persons to whom it refers and that only they can decide on such data. In this sense,

LAFAYETTE will only use the data for the purposes for which it is duly empowered, and respecting in all cases the current regulations on the protection of personal data.

14. GUARANTEES FOR RIGHT OF ACCESS

LAFAYETTE will guarantee the right of access when, after proof of the Data Owner's identity, legitimacy, or personality of their representative, making available to the latter, at no cost or expense, in a detailed manner, the respective personal data through any kind of medium, including electronic means that allow direct Owner access to it. Such access must be offered without any limitation and must allow the Data Owner the possibility of knowing and updating the data online.

15. ENQUIRIES

The Data Owners, or their successors in title, may consult the Owner's personal data that rests in any database. Consequently, LAFAYETTE will guarantee the right of enquiry, providing the Data Owners all the information contained in their individual record or that is linked to the Data Owner's identification.

With respect to the attention of requests for enquiry of personal data, LAFAYETTE guarantees:

- Enabling electronic communication means or others that it considers pertinent.

Establishing forms, systems and other simplified methods, which must be informed in the Privacy Statement.

- Using the customer or claims services it has in operation.
- In any case, regardless of the mechanism implemented for the attention of requests for enquiry, they will be served within a maximum term of ten (10) business days from the date of receipt. When it is not possible to attend to the enquiry within said term, the interested party will be informed before the expiration of the 10 days, stating the reasons for the delay and indicating the date on which the enquiry will be attended to, which in no case may exceed five (5) business days following the expiration of the first term.

16. CLAIMS

If the Data Owner, or their successors in title, considers that the information contained in a database must be corrected, updated or deleted, or when they note the alleged breach of any of the duties contained in the Law, they may file a claim with the Data Controller, channeling and submitting it through the designated unit and whose contact details are specified later in Section 23 of this document, and which will exercise the function of personal data protection within Lafayette.

The claim may be submitted by the Data Owner, taking into account what is indicated in Article 15 of Law 1581 of 2012 and Decree 1377 of 2013, and other regulations that modify or add to them.

17. IMPLEMENTATION OF PROCEDURES TO GUARANTEE THE RIGHT TO SUBMIT CLAIMS

At any time and free of charge, the Data Owner or their representative may request from LAFAYETTE staff, the rectification, updating or deletion of their personal data, upon proof of identity.

The rights of rectification, updating or deletion may only be exercised by:

- a) The Data Owner or their successors in title, upon proof of his identity, or through electronic instruments that allow to identify themselves.
- b) Their representative, upon accreditation of the representation.

When the request is made by a person other than the Data Owner, the identity or mandate to act must be accredited in due form; and in case of not accrediting such quality, the request will be considered as not submitted.

The request for rectification, updating or deletion must be submitted through the means enabled by LAFAYETTE indicated in the Privacy Statement and contain, at least, the following information:

- The name and address of the Data Owner or any other means to receive the response.
- Documents proving the identity or mandate of the representative.
- A clear and precise description of the personal data with respect to which the Data Owner seeks to exercise any of the rights.
- If necessary, other elements or documents that facilitate the location of the personal data.

18. DATA CORRECTION AND UPDATING

LAFAYETTE is obliged to correct and update at the request of the Data Owner, any data of the latter that is incomplete or inaccurate, in accordance with the procedure and the terms indicated above. In this regard, the following will be taken into account:

- In requests for correction and updating of personal data the Data Owner must indicate the corrections to be made and provide the documentation that supports their request.
- LAFAYETTE has full freedom to enable mechanisms that facilitate the exercise of this right, as long as they benefit the Data Owner. Consequently, electronic or other means may be enabled, as it considers pertinent.
- LAFAYETTE may establish forms, systems and other simplified methods, which must be informed in the Privacy Statement and made available to interested parties on the website.

19. DELETION OF DATA

The Data Owner has the right, at all times, to request LAFAYETTE, the deletion of their personal data when:

- a) They deem to not be treated in accordance with the principles, duties and obligations set forth in the current regulations.
- b) The data has ceased to be necessary or pertinent for the purpose for which it was collected.
- c) The period necessary for the fulfillment of the purposes for which it was collected has been exceeded.

Said deletion implies the total or partial elimination of personal information in accordance with the request by the Data Owner in the records, files, databases or processing performed by LAFAYETTE. It is important to bear in mind that the right of cancellation is not absolute and the person in charge can deny the exercise of the same when:

- a) The Data Owner has a legal or contractual duty to remain in the database.
- b) The elimination of data may hinder judicial or administrative proceedings linked to fiscal obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- c) The data is necessary to protect the legally protected interests of the Data Owner; to perform an action based on public interest, or to comply with an obligation legally acquired by the Data Owner.

20. AUTHORIZATION REVOCATION

The Personal Data Owners may revoke the consent to the processing of their personal data at any time, provided it is not prevented by a legal or contractual provision. To do this, LAFAYETTE must establish simple and free mechanisms that allow the Data Owner to revoke their consent, at least by the same means by which they granted it.

It should be borne in mind that there are two ways in which revocation of consent can occur. The first one can be regarding the totality of the consented purposes, that is, that LAFAYETTE should stop processing the Owner's data completely; the second can occur on certain types of processing, such as for advertising or market research purposes. The second modality, that is, the partial revocation of the consent, maintains other processing purposes that the Data Controller, in accordance with the authorization granted, may carry out and to which the Data Owner agrees.

21. DATA SECURITY AND SECURITY MEASURES

In development of the security principle established in the current regulations, LAFAYETTE will adopt the technical, human and administrative measures that are

necessary to ensure the security of the records, avoiding their adulteration, loss, consultation, unauthorized or fraudulent use or access.

22. USE AND INTERNATIONAL TRANSFER OF PERSONAL DATA AND PERSONAL INFORMATION BY TEXTILES LAFAYETTE

Depending on the nature of the permanent or occasional relationships that any personal data Owner may have with LAFAYETTE, all of their information may be transferred abroad, subject to the applicable legal requirements, with the acceptance of this policy, expressly authorizes the transfer of any Personal Information. The information will be transferred, for all the relationships that may be established with LAFAYETTE without prejudice to the obligation to observe and maintain the confidentiality of the information, LAFAYETTE will take the necessary measures so that those third parties know and commit themselves to observe this Policy, under the understanding that the personal information they receive may only be used for matters directly related to the relationship with LAFAYETTE, for the duration of it, and may not be used or intended for any other purpose.

LAFAYETTE may also exchange Personal Information with governmental or other public authorities (including, among other judicial or administrative authorities, tax authorities and criminal, civil, administrative, disciplinary and fiscal investigation bodies), and third parties participating in civil and legal proceedings and their accountants, auditors, attorneys and other advisors and representatives, whether it is necessary or appropriate: (a) to comply with applicable laws, including laws other than those of their country of residence; (b) to comply with legal processes; (c) to respond to requests from public authorities and the government, and to respond to requests from public and government authorities other than those of their country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, security or property, the Data Owners' or those of third parties; and (g) obtain the applicable indemnities or limit the damages that may affect us.

23. CONTACT DETAILS

Address: Calle 15 # 72-95.

Phone: 4248888.

E-mail: servicioalcliente@lafayette.com.

VALIDITY

This manual is valid as of the twenty-ninth (29th) of October, 2015 and renders any regulations or special manuals that could have been adopted prior to it invalid.