



## **DATA PROCESSING POLICIES**

### **PRIME INTERNATIONAL SERVICES S.A.S.**

PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, with tax ID NIT No. 901484995-8, with main address in Manga, Cra. 15 #26-98 Bahía de San Lázaro Building – Local 1, in the city of Cartagena de Indias, in its daily operation brings together information of clients, visitors, suppliers, collaborators, employees or any person who owns personal data which is kept in its database, in order to carry out promotional and marketing tasks and/or to report to the control and surveillance authorities.

In accordance with Law 1581 of 2012 and Decree 1377 of 2013, which regulate the Protection of Personal Data, especially financial, credit, commercial, services and other related regulations in force in Colombia, PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, discloses through this data processing policy, the terms and conditions of the treatment and administration of the personal data of the data owner.

## **CHAPTER I**

### **GENERAL DISPOSITION**

#### **ARTICLE 1. DEFINITIONS**

a) Authorization: Prior, express and informed consent of the Holder to carry out the Processing of personal data.

b) Privacy Notice: Verbal or written communication generated by the Responsible Party addressed to the Owner for the processing of their personal data, through which they are informed about the existence of privacy policies.

Treatment of information that will be applicable to you, the way to access them and the purposes of the Treatment that is intended to be given to personal data.

c) Database: Organized set of personal data that is subject to Treatment.

d) Personal data: Any information linked to or that may be associated with one or more specific or determinable natural persons.

e) Private data: It is the data that, due to its intimate or reserved nature, is only relevant to the owner.

f) Sensitive data: Sensitive data is understood to be those that affect the privacy of the Holder or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions, social or human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life and biometric data.

g) 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 Data Controller.

h) Responsible for the Treatment: 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.

i) Owner: Natural person whose personal data is subject to Treatment.

j) Treatment: Any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion of the same.

## **ARTICLE 2. PRINCIPLES**

In the development, interpretation and application of Law 1581 of 2012, the following principles will be applied in a harmonious and comprehensive manner:

a) Principle of legality: The treatment will be subject to the established rules and other provisions that develop it.

b) Principle of purpose: The owner will be informed of the legitimate purpose of the same in accordance with the constitution and the laws.

c) Principle of freedom: The treatment can only be exercised with the prior, express and informed consent of the owner or a legal or judicial mandate.

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

e) Principle of Transparency: The owner is guaranteed to obtain from the person in charge or the person in charge of the treatment, at any time and without restrictions, information about the existence of data concerning you.

f) Principle of access and restricted circulation: The treatment is subject to the limits that derive from the nature of the personal data, the provisions of the law and the constitution. Personal data, except for public information,



may not be available on the Internet or other means of disclosure or mass communication, unless access is technically controllable to provide restricted knowledge only to owners or authorized third parties.

g) Principle of security: The information subject to treatment will be handled with the technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

h) Principle of confidentiality: PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA is obliged to guarantee the confidentiality of the information, even after the end of its relationship with any of the tasks that includes the treatment, being able to only supply or communicate personal data when this corresponds to the development of the authorized activities in the INN YACHTS COLOMBIA. law.

### **ARTICLE 3. PURPOSE**

The purpose of this document is to regulate the procedures for collecting, handling and processing personal data carried out by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, in order to guarantee and protect the fundamental right of habeas data of guests, visitors, customers, users, suppliers and employees within the framework of what is established by law.

### **ARTICLE 4. SCOPE OF APPLICATION**

This manual will be applicable to the personal data registered and to be registered in the different databases managed by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, that is, to the databases of visitors, customers, suppliers and employees who provide us with their data for commercial, labor and service purposes in each particular case.

The information collected by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, will depend in whole or in part according to the needs that are required. These data may be stored and/or processed on servers, whether their own or contracted with third-party providers, which is authorized by visitors, clients, user providers and employees by accepting this Policy. The following data can be:

- Names and surnames.
- Type and identification number.





- Nationality and country of residence.
- Date of birth and gender.
- Marital status and/or kinship in relation to minors or disabled applicants for our services.
- Landlines and cell phones for contact (personal and/or work).
- Postal and electronic addresses (personal and/or work).
- Profession or occupation.
- Company where you work and position.
- Origin and destination.
- Reason for your trip.
- Credit card(s) information (number, bank entity, date of expiration) and data of the holder of the same (names and surnames, type and identification number).

#### **ARTICLE 5. ACCURACY OF THE INFORMATION**

Visitors, clients, users, suppliers and employees must provide truthful information about their personal data in order to make their respective registration by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA and under whose condition they agree to deliver the required information. PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA presumes the veracity of the information provided and does not verify, nor does it assume the obligation to verify, the identity of the guests, visitors, clients, supplier users and employees, nor the veracity, validity, sufficiency and authenticity of the data that each of them provide. Therefore, it does not assume responsibility for damages and/or losses of any nature that could originate from the lack of veracity, validity, sufficiency or authenticity of the information, including damages and losses that may be due to homonymy or identity theft.

#### **ARTICLE 6. INFORMATION ON CHILDREN AND ADOLESCENTS UNDER AGE**

The treatment of personal data of children and/or adolescents who are of a public nature will comply with the following parameters and requirements:

- a) That it responds to and respects the best interests of children and teenagers.
- b) To ensure respect for their fundamental rights.
- c) That values the opinion of the minor when he/she has the maturity, autonomy and ability to understand the matter.





Once the above requirements have been fulfilled, the legal representative of the boy, girl or

The adolescent may grant authorization for the treatment, after exercising the right of the minor to be heard, an opinion that must be assessed taking into account the maturity, autonomy and ability to understand the matter. When necessary, PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA will give specific instructions to minors so that they do not provide Personal Data.

#### **ARTICLE 7. PURPOSES OF DATA PROCESSING PERSONAL**

The information collected is used to process, confirm, fulfill and provide the services and/or products purchased, directly and/or with the participation of third-party providers of products or services, as well as to promote and advertise our activities, products and services, perform transactions, make reports to the different national or international administrative control and surveillance authorities, police authorities or judicial authorities, banking entities and/or insurance companies, for internal administrative and/or commercial purposes such as market research, audits, reports accounting, statistical analysis, billing, and offering and/or recognition of benefits of our loyalty programs.

By accepting this Privacy and Treatment Policy, visitors, customers, users, suppliers and employees in their capacity as data owners collected, authorize PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA carry out the treatment of the same, partially or totally, including the collection, storage, recording, use, circulation, processing, deletion, for the execution of the activities related to the services and products acquired, such as, making reservations, modifications, cancellations and changes of the same, refunds, attention to queries, complaints and claims, payment of compensation and indemnities, accounting records, correspondence, processing and verification of credit cards, debit cards and other payment instruments, identification of fraud and prevention of money laundering and other criminal activities and/or for the operation of loyalty programs and other purposes indicated in this document.

We warn that third parties may be involved in these activities suppliers (such as reservation system providers, travel agencies, call centers, banks, insurance companies). Additionally, our travellers, customers and





users, in their capacity as holders of the data collected, by accepting this privacy policy, authorize us to:

- Use the information received from them, for marketing purposes of their products and services, and the products and services of third parties with which

PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA maintain a business relationship.

- Provide personal data to police or judicial control and surveillance authorities, by virtue of a legal or regulatory requirement and/or use or disclose this information and personal data in defense of their rights.

rights and/or their assets insofar as said defense is related to the products and/or services contracted by its travellers, clients and users.

- Allow access to information and personal data to auditors or third parties hired to carry out internal audit processes or external own of the commercial activity that we develop.

- Consult and update personal data, at any time, in order to keep said information updated.

- Contract with third parties the storage and/or processing of the information and personal data for the correct execution of contracts held with us, under the security and confidentiality standards to which we are bound.

## **CHAPTER II AUTHORIZATION**

### **ARTICLE 8. AUTHORIZATION**

The collection, storage, use, circulation or deletion of personal data by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA requires the free, prior, express and informed consent of the owner thereof. PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, in its capacity as the person responsible for the processing of personal data, has provided the necessary mechanisms to obtain the authorization of the holders, guaranteeing in any case that it is possible to verify the granting of said





authorization. With the aforementioned authorization, the client accepts the policies and conditions established in this document.

**PARAGRAPH 1. CASES IN WHICH AUTHORIZATION IS NOT NEEDED**

**OF THE HOLDER OF THE INFORMATION.** The authorization of the owner of the information It will not be necessary when it comes to:

- a) Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- b) Data of a public nature.
- c) Cases of medical or health emergency.
- d) Treatment of information authorized by law for historical purposes, statistics or scientists.
- e) Data related to the Civil Registry of persons.

**ARTICLE 9. FORM AND MECHANISMS TO GRANT THE AUTHORIZATION**

The authorization of the owner of the information will appear in each of the data collection channels and mechanisms of PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA. The authorization of the title will be understood to have been delivered when it is made in writing, orally or through unequivocal conduct by the Holder that allows for the reasonable conclusion that the authorization was granted in accordance with the provisions of Law 1581 of 2102. In no case may silence assimilate to an unequivocal conduct. PROOF OF THE WAY IN WHICH THE HANDLING OF DATA WAS AUTHORIZED SHOULD ALWAYS BE MAINTAINED.

With the consented authorization procedure, it is guaranteed that the owner of the personal data has been made aware of both the fact that their personal information will be collected and used for certain and known purposes, and that they have the option of knowing any changes to them. and the specific use that has been made of them. The foregoing in order for the owner to make informed decisions regarding their personal data and control the use of their personal information.

**CHAPTER III**

**RIGHTS AND DUTIES**

**ARTICLE 10. RIGHTS OF THE INFORMATION HOLDERS**





In accordance with the provisions of article 8 of Law 1581 of 2012, the owner of personal data has the following rights:

- a) Know, update and rectify your personal data against PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, in its capacity as data controller.
- b) Request proof of the authorization granted to PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, in its capacity as Data Controller.
- c) Be informed by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA upon request, regarding the use that has been given to your personal data.
- d) Submit to the Superintendency of Industry and Commerce complaints for violations of the provisions of Law 1581 of 2012, once the process of query or claim before the Data Controller.
- e) Revoke the authorization and/or request the deletion of the data when in the

Treatment does not respect the principles, rights and constitutional and legal guarantees.

- f) Free access to your personal data that has been subject to Treatment.

Likewise, the owner has the right to request their rectification in case they are inaccurate or incomplete and to cancel them when they are not being used in accordance with legal or contractual purposes and terms or according to the purposes and terms contemplated in this Treatment Policy.

PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA will guarantee the right of access when, prior accreditation of the identity of the owner or his representative or proxy, he requests it as provided in Law 1581 of 2012. Clients and users can exercise their rights to know, update, rectify and delete your personal data by sending your request to the email: [comercial@innyachts.co](mailto:comercial@innyachts.co) (in the email you must include the following information in the request: Names and surnames, type of document, document number, telephone, email, City or Country, Subject).

### **ARTICLE 13. RESPONSE TO INQUIRIES**

In any case, regardless of the mechanism implemented to attend consultation requests, they will be attended to within a maximum term of ten







(10) business days from the date of receipt. When it is not possible to attend the query within said term, the interested party will be informed before the expiration of the 7 days, stating the reasons for the delay and indicating the date on which his query will be attended, which in no case may exceed five (5) business days following the expiration of the first installment.

#### **ARTICLE 14. CLAIMS**

In accordance with the provisions of article 14 of Law 1581 of 2012, the Holder or his successors in title who consider that the information contained in a database must be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012, may present a

claim before the Data Controller, which will be processed under the following rules:

1. The claim may be submitted by the Holder in the formats provided for this purpose by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA in your registry by any means. If the claim received does not have complete information that allows it to be processed, that is, 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, the interested party within seven (7) days of receipt 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. If for any reason the Company receives a claim that should not actually be directed against it, it will transfer it to the appropriate person within a maximum period of two (2) business days and will inform the interested party of the situation.

2. Once the complete claim is received, it will be included in the database maintained by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA a legend that says “claim in process” and the reason for it, within a term not exceeding two (2) business days. Said legend must be kept until the claim is decided.

3. The maximum term to address the claim will be ten (10) business days. counted from the day following the date of receipt. when it wasn't possible to attend it within said term, the interested party will be informed before





of the expiration of the aforementioned term, the reasons for the delay and the date on which your claim will be dealt with, which in no case may exceed five (5) business days following the expiration of the first term.

#### **ARTICLE 15. IMPLEMENTATION OF PROCEDURES TO GUARANTEE THE RIGHT TO SUBMIT CLAIMS**

At any time and at no cost to the owner or his representative, they may request PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA the rectification, updating or deletion of your personal data, after proof of your identity. The rights of rectification, update or deletion may only be exercised by:

- The holder or his successors in title, after proof of his identity, or through electronic instruments that allow him to identify himself.
- Your representative, prior accreditation of the representation.

When the request is made by a person other than the holder and it is not proven that the same acts on behalf of the former, it will be deemed not submitted. The request for rectification, updating or deletion must be submitted through the means enabled by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA and contain, at a minimum, the following information:

#### **POLICY HANDBOOK**

1. The name and address of the holder or any other means to receive the answer.
2. Documents proving the identity or personality of your representative.
3. The clear and precise description of the personal data with respect to which the owner seeks to exercise any of the rights.
4. Where appropriate, other elements or documents that facilitate the location of personal data.

**PARAGRAPH 3. RECTIFICATION AND UPDATING OF DATA.** PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA has the obligation to rectify and update at the request of the owner, the information of the latter that turns out to be 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 rectification and updating of personal data, the owner must indicate the corrections to be made and provide the documentation that supports their request. PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA has full freedom to enable mechanisms that facilitate the exercise of this right, as long as they benefit the owner. Consequently, electronic or other means that it considers pertinent may be enabled and that will be made available to interested parties on the website [www.innyachtscolumbia.co](http://www.innyachtscolumbia.co)

**PARAGRAPH 4. DELETION OF DATA.** The owner has the right, in all moment, to request PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA the deletion (elimination) of your personal data when:

- a) Consider that they are not being treated in accordance with the principles, duties and obligations provided for in Law 1581 of 2012.
- b) They have ceased to be necessary or pertinent for the purpose for which they were collected.
- c) The period necessary for the fulfillment of the purposes for which they were collected has been exceeded.

This suppression implies the total or partial elimination of the personal information in accordance with the request of the owner in the records, files, databases or treatments carried out by PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA. 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:

- The request for deletion of the information will not proceed when the holder have a legal or contractual duty to remain in the database.
- The elimination of data hinders judicial or administrative actions related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- The data is necessary to legally protect the interests wards of the owner; to carry out an action based on the public interest, or to comply with an obligation legally acquired by the owner.

If the cancellation of personal data is appropriate, PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA must operationally carry out the



suppression in such a way that the elimination does not allow the recovery of the information.

#### **ARTICLE 16. REVOCATION OF THE AUTHORIZATION.**

The data holders may revoke consent to the processing of their data at any time, as long as it is not prevented by a legal provision. To do this, they must contact PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, by email: [comercial@innyachts.co](mailto:comercial@innyachts.co)

It should be noted that there are two ways in which the revocation of consent can occur. The first may be for all of the consented purposes, that is, that PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA must completely stop processing the owner's data; the second, can occur on certain types of treatment, such as for advertising purposes or market research. With the second modality, that is, the partial revocation of consent, other processing purposes are kept safe that the person in charge, in accordance with the authorization granted, can carry out and with which the owner agrees.

Due to the foregoing, it will be necessary for the holder to submit the request for consent revocation to PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, indicate in it if the revocation you intend to make is total or partial. In the second hypothesis, it must be indicated with which treatment the owner is not satisfied. There will be cases in which the consent, due to its necessary nature in the relationship between the owner and the person responsible for the fulfillment of a contract, by legal provision may not be revoked. The mechanisms or procedures that PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA establishes to attend to the requests for revocation of consent may not exceed the deadlines established to attend to the claims as indicated in article 15 of Law 1581 of 2012.

In accordance with article 10 of Decree 1377 of 2013, if within thirty (30) days from the date of this communication the Holders of the information have not contacted PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA, requesting the deletion of your personal data, may continue to process it for the purposes described in this document and in its personal data protection treatment policy.



## **CHAPTER V**

### **SECURITY OF THE INFORMATION**

#### **ARTICLE 17. SECURITY MEASURES**

In development of the security principle established in Law 1581 of 2012, PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA has adopted the technical, human and administrative measures that are necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

Notwithstanding the foregoing, the client assumes the risks derived from delivering this information in a medium such as the Internet, which is subject to various variables – third-party attacks, technical or technological failures, among others. PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA will make its best technological effort to guarantee the security of the personal information of all its clients and/or users, using reasonable and current security methods to prevent unauthorized access, to maintain the accuracy of the data and guarantee the correct use of information.

## **CHAPTER VI**

### **FINAL PROVISIONS**

#### **ARTICLE 18. MODIFICATIONS TO THE PRIVACY POLICY**

PRIME INTERNATIONAL SERVICES S.A.S. – INN YACHTS COLOMBIA reserves the right to make changes or updates to this Treatment Policy at any time, for the attention of new legislation, internal policies or new requirements for the provision or offering of its services or products.

#### **ARTICLE 19. DATA AND INFORMATION PROCESSING VALIDITY PERSONAL**

The information provided by customers and users will remain stored for up to fifteen (15) years from from the date of the last treatment, to allow us to comply with the legal and/or contractual obligations under its responsibility, especially in accounting, fiscal and tax matters.

#### **ARTICLE 20. VALIDITY OF THE MANUAL**

This manual will take effect from the date of its approval.

