

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 1 de 16

1. Compliance with Regulations and Objective of the Personal Data Processing Policy

This policy for the processing of personal data (hereinafter the “Policy”) establishes the guidelines through which **MARINE CONSULTANCY INSPECTIONS S.A.S.** (hereinafter “MARINE CONSULTANCY INSPECTIONS” or the “Company”) and other companies or entities that belong or may come to belong to the same control group and/or financial group of MARINE CONSULTANCY INSPECTIONS S.A.S., domiciled in Colombia and/or abroad, shall be governed with respect to the collection, storage, use, circulation, transfer, deletion and other activities that constitute the processing of personal data in accordance with Law 1581 of 2012, Regulatory Decree 1377 of 2013, the Unified Circular of the Superintendence of Industry and Commerce and other provisions on the matter, for the protection of personal data.

The Policy details the general corporate guidelines that are taken into account for the purpose of protecting the Personal Data of the Data Subjects, such as the purpose of the collection of the information, rights of the Data Subjects, responsible areas for addressing complaints and claims, as well as the procedures that must be exhausted to know, update, rectify and delete the information.

MARINE CONSULTANCY INSPECTIONS S.A.S., in compliance with the constitutional right to Habeas Data, only collects Personal Data when this has been previously authorized by its Data Subject, implementing for such purpose clear measures regarding the confidentiality and privacy of Personal Data.

2. Scope

MARINE CONSULTANCY INSPECTIONS S.A.S., identified with NIT 900270018–4, with principal address at CALLE 77 # 59–35, OFICINA 1004, EDIFICIO EMPRESARIAL LAS AMERICAS III. Hereinafter referred to as MARINE CONSULTANCY INSPECTIONS S.A.S., in its capacity as the Data Controller, recognizes the importance of the security, privacy and confidentiality of the personal data of its employees, clients, suppliers, beneficiaries, and, in general, of all its stakeholders with respect to whom it processes personal information; therefore, in compliance with constitutional and legal mandates, it presents the following document containing its policies for the processing and protection of personal data, for all its activities involving the processing of personal information at the national level, as well as the processing of personal data at the international level in accordance with legislation, agreements and international treaties.

For purposes of this Policy, when reference is made to clients, suppliers, strategic partners, contractors or third parties that are legal entities, the processing shall apply to the personal data of the natural persons associated with them, such as legal representatives, employees, business contacts, attorneys-in-fact, authorized persons or beneficial owners, as applicable.

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 2 de 16

3. Identification of the Data Controller

Corporate Name: MARINE CONSULTANCY INSPECTIONS S.A.S.

Identification: Nit 900270018 – 4.

Address: CALLE 77 # 59 – 35 OFICINA 1004 EDIFICIO EMPRESARIAL LAS AMERICAS III

Email: inquiries@mci-sas.co

Website: www.mci-sas.co

Contact Telephone: 3148632583

4. Definitions

- 4.1 **Authorization:** Prior, express and informed consent of the Data Subject to carry out the processing of personal data.
- 4.2 **Privacy Notice:** Verbal or written communication generated by the Data Controller, addressed to the Data Subject for the processing of their Personal Data, through which they are informed about the existence of the information processing policies applicable to them, the manner of accessing them and the purposes of the Processing intended to be given to the Personal Data.
- 4.3 **File:** Set of data recorded as a single storage unit, containing personal data.
- 4.4 **Database:** Organized set of Personal Data that is subject to Processing.
- 4.5 **Substantial Changes:** Substantial changes are those related to the purpose of the database, the Data Processor, the channels for providing attention to the Data Subject, the classification or types of personal data stored in each database, the information security measures implemented, the information processing policy, and the transfer and transmission of the personal data database, numeral 2.3, Circular 002 of November 2015.
- 4.6 **Client:** Natural or legal person who acquires the products and/or services of MARINE CONSULTANCY INSPECTIONS S.A.S.
- 4.7 **Personal Data:** Any information linked to or that may be associated with one or several determined or determinable natural persons.
- 4.8 **Public Data:** Data that is not semi-private, private or sensitive. Public Data includes, among others, data relating to the marital status of persons, their profession and occupation, and their status as a merchant or public servant. By its nature, Public Data may be contained, among others, in public records, public documents, gazettes and official bulletins, and duly final and enforceable judicial decisions that are not subject to confidentiality.
- 4.9 **Financial Data:** Personal Data referring to the creation, performance and extinguishment of monetary obligations, regardless of the nature of the contract giving rise to them, the Processing of which is governed by Law 1266 of 2008 or the regulations that complement, modify or add to it.
- 4.10 **Sensitive Data:** Sensitive Data is understood as data that affects the privacy of the Data Subject or whose improper use may generate discrimination against them, such as data that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions,

 Reliable Inspections, safe solution	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 3 de 16

social organizations, human rights organizations or organizations that promote the interests of any political party, or that guarantee the rights and guarantees of opposition political parties, as well as data relating to health, sexual life, and biometric data.

- 4.11 **Employee:** Natural person who is employed by MARINE CONSULTANCY INSPECTIONS S.A.S. S.A.S.
- 4.12 **Data Processor:** Natural or legal person, public or private, who, by themselves or in association with others, carries out the Processing of Personal Data on behalf of the Data Controller. In cases where the Data Controller does not act as the Data Processor of the Database, the person who will act as the Data Processor shall be expressly identified.
- 4.13 **Supplier:** Any natural or legal person that supplies goods or services required by MARINE CONSULTANCY INSPECTIONS S.A.S. for its operation.
- 4.14 **Data Controller:** Natural or legal person, public or private, who, by themselves or in association with others, decides on the Database and/or the Processing of the data.
- 4.15 **Deletion:** This is the action requested by the Data Subject from the Data Controller and/or Data Processor, in exercise of the right to freedom and purpose regarding their information.
- 4.16 **Data Subject:** Natural person whose Personal Data is subject to Processing.
- 4.17 **Processing:** Any operation or set of operations on Personal Data, such as collection, storage, use, circulation or deletion.
- 4.18 **Transfer:** The Transfer of data takes place when the Data Controller and/or Data Processor of personal data, located in Colombia, sends the information or Personal Data to a recipient, who in turn is a Data Controller and is located inside or outside the country.
- 4.19 **Transmission:** Processing of Personal Data that involves the communication of such data within or outside the territory of the Republic of Colombia when its purpose is the carrying out of Processing by the Data Processor on behalf of the Data Controller.
- 4.20 **Recording:** Refers to the action through which images, sounds, data are collected or recorded, normally by using some device or machine, such as a recorder, a video camera, a camera, among others, which will record them on a specific medium so that they may later be reproduced.
- 4.21 **Video Recordings:** The technology of recording, processing, storage, transmission of images and reconstruction by digital or analog electronic means of a sequence of images representing moving scenes.
- 4.22 **Fingerprint:** The visible impression generated by the contact of the papillary ridges of a human finger on a specific surface.
- 4.23 **Digital Fingerprint:** The digitized collection of the fingerprint.
- 4.24 **Visitor:** Any person who enters the facilities and does not have an employment or contractual relationship with MARINE CONSULTANCY INSPECTIONS S.A.S.

5. Applicable Principles for the Processing of Personal Data

In the development, interpretation, application and implementation of this Policy, MARINE CONSULTANCY INSPECTIONS S.A.S. shall comply with the principles

 Reliable Inspections, safe solution	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 4 de 16

established in Law 1581 of 2012 and other regulations that govern, amend or supplement the personal data protection regime in Colombia. Consequently, the Processing of Personal Data shall be subject, among others, to the following principles:

- a. **Principle of Legality:** The Processing of Personal Data is a regulated activity and must be carried out in accordance with the Political Constitution, Law 1581 of 2012, its regulatory decrees and other applicable regulations.
- b. **Principle of Purpose:** The Processing of Personal Data shall pursue a legitimate purpose, previously informed to the Data Subject, in accordance with the Constitution and the law. Consequently, MARINE CONSULTANCY INSPECTIONS S.A.S. must process Personal Data solely for the purposes authorized by the Data Subject or permitted under applicable regulations.
- c. **Principle of Freedom:** The Processing of Personal Data may only be carried out with the prior, express and informed consent of the Data Subject, except in cases where authorization is not required by law. Personal Data may not be obtained or disclosed without prior authorization or in the absence of a legal or judicial mandate exempting such consent.
- d. **Principle of Truthfulness or Quality:** Information subject to Processing must be truthful, complete, accurate, up-to-date, verifiable and understandable. MARINE CONSULTANCY INSPECTIONS S.A.S. shall refrain from processing partial, incomplete, fragmented or misleading data.
- e. **Principle of Transparency:** In the Processing of Personal Data, the Data Subject shall be guaranteed the right to obtain from MARINE CONSULTANCY INSPECTIONS S.A.S., at any time and without unjustified restrictions, information regarding the existence of data concerning them and the use made of such data.
- f. **Principle of Restricted Access and Circulation:** The Processing of Personal Data may only be carried out by persons authorized by the Data Subject and/or by those legally authorized to do so. Personal Data shall not be made available on the Internet or through other means of mass dissemination, unless access is technically controllable in order to provide restricted access exclusively to Data Subjects or third parties authorized in accordance with the law.
- g. **Principle of Security:** Information subject to Processing by MARINE CONSULTANCY INSPECTIONS S.A.S. shall be handled using the technical, human and administrative measures necessary to ensure the security of the records, preventing their alteration, loss, consultation, use, unauthorized access or fraudulent access.
- h. **Principle of Confidentiality:** All persons involved in the Processing of Personal Data that is not public in nature shall be obligated to guarantee the confidentiality of the information, even after the termination of their relationship with any of the activities comprising such Processing. Personal Data may only be provided or disclosed when this is necessary for the performance of activities authorized by the Data Subject, for the purposes established in this Policy, or pursuant to a legal or judicial mandate.
- i. **Principle of Demonstrable Accountability:** MARINE CONSULTANCY INSPECTIONS S.A.S. shall adopt appropriate, effective and verifiable

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 5 de 16

measures to ensure compliance with regulations concerning the protection of Personal Data, seeking to retain evidence of authorizations, procedures, security measures, the handling of inquiries and claims, and other actions related to the Processing of Personal Data.

6. Processing

MARINE CONSULTANCY INSPECTIONS S.A.S., acting in its capacity as the Data Controller of Personal Data, for the proper development of its corporate purpose and the strengthening of its relationships with its stakeholders, collects, stores, uses and circulates Personal Data relating to natural persons with whom it has or has had a relationship, such as employees, shareholders, clients, suppliers, creditors and debtors

7. Types of Data Subjects of Information Processing

In the development of its business activities, MARINE CONSULTANCY INSPECTIONS S.A.S. recognizes that it processes the Personal Data of different Data Subjects, understood as the natural persons to whom the Personal Data subject to Processing relates; The foregoing Data Subjects have been identified and categorized based on the different activities that define the operations of MARINE CONSULTANCY INSPECTIONS S.A.S., as set forth below.

- a. **Clients:** Group of natural or legal persons who have a commercial relationship with or direct access to the services provided by MARINE CONSULTANCY INSPECTIONS S.A.S. in the development of the activities inherent to its corporate purpose. The types of data processed are:
 - Identification Data, including biometric data.
 - Private and commercial location data.
 - Financial and tax identification data.
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- b. **Strategic Partners:** Group of natural and/or legal persons who, due to their particular conditions and interpersonal and commercial relationships, facilitate MARINE CONSULTANCY INSPECTIONS S.A.S.'s effective approach to its target audience and/or potential clients. The types of data processed are:
 - Identification Data, including biometric data.
 - Private and commercial location data.
 - Financial and tax identification data.
- c. **Suppliers:** Natural or legal persons who provide personal or professional services, in accordance with their competencies and the needs of MARINE CONSULTANCY INSPECTIONS S.A.S.
 - Identification Data, including biometric data.
 - Commercial location data.
 - Financial and tax identification data.

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 6 de 16

- Socioeconomic Data: Information related to academic, employment and professional background, information regarding the type of affiliation with the Comprehensive Social Security System, and tax identification data.
- Other Data: Judicial or disciplinary records.

- d. **Employees:** Refers to natural persons who formalize a contractual legal relationship to make their work capacity available to MARINE CONSULTANCY INSPECTIONS S.A.S. These persons are an active part of the operational and support processes of MARINE CONSULTANCY INSPECTIONS S.A.S. The types of data processed are:
- Identification Data, including biometric information.
 - Private location data.
 - Socioeconomic Data: Economic information, tax information, asset information, employment-related data, educational level, and information related to the Comprehensive Social Security System.
 - Other Data: Judicial or disciplinary records.

The Processing may include the collection, storage, use, circulation, consultation, updating, transmission, transfer, retention, suppression and deletion of Personal Data, in accordance with the purposes authorized by the Data Subject or permitted by law.

8. Purpose or Uses of the Information

Personal Data is subject to Processing by MARINE CONSULTANCY INSPECTIONS S.A.S. for the following purposes:

- To send information to its clients, employees, suppliers and strategic partners;
- In the case of employees, to send information to pension funds, EPS Administrators, Compensation Funds, ARL, among other stakeholders that promote the Company's occupational well-being and health;
- For the recognition, protection and exercise of the rights of the Company's shareholders;
- To strengthen relationships with its clients by sending relevant information, invoices and documentation related to the provision of services, and invitations to events organized by the Company, among others;
- To ensure timely and quality supply from its suppliers through the assessment of their compliance with their obligations and invitations to events organized by the Company, among others;
- To verify balances owed by its creditors;
- To determine outstanding obligations, consult financial information and credit history, and report defaulted obligations to credit information

 MCI MARINE CONSULTANCY INSPECTIONS Reliable Inspections, safe solution	STRATEGIC MANAGEMENT		Code: GE-PO-06
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY		Version: 02
			Date: 23-07-2026
			Page: 7 de 16

- agencies, with respect to its debtors;
- h. For marketing activities and other commercial purposes that do not contravene the legislation in force in Colombia;
 - i. To respond to judicial or administrative requests and comply with judicial or legal orders;
 - j. To carry out advertising and marketing campaigns;
 - k. To implement customer loyalty programs;
 - l. To conduct credit, collection or credit risk assessments;
 - m. To enter into commercial agreements and carry out institutional events or programs, directly or in association with third parties;
 - n. To verify data through consultations of public databases or credit reporting agencies;
 - o. To maintain and manage the information provided;
 - p. To share information with related, controlled or affiliated entities, or entities with which it has any type of relationship, for the purpose of sending commercial, advertising or informational communications related to the entity or any other product or service;
 - q. To share information contained in the Databases with suppliers, financial institutions and contractors in general;
 - r. To comply with the obligations arising from contractual relationships that may be established with the Data Subject;
 - s. To send invitations to events and offer new products and services;
 - t. To provide contact information to the sales force and/or distribution network, telemarketing, market research teams, and any third party with whom MARINE CONSULTANCY INSPECTIONS S.A.S. has a contractual relationship for the development of activities of this type (market research and telemarketing, etc.), for the performance thereof;
 - u. To share and directly or indirectly carry out the national or international transmission and/or transfer of data to third countries, when essential for the proper functioning of the organization, to carry out collection activities, or to verify my commercial and financial information;
 - v. To use the Personal Data collected through security checkpoints, security personnel and video recordings carried out inside or outside the facilities of MARINE CONSULTANCY INSPECTIONS S.A.S., for commercial, security and surveillance purposes and as evidence in any type of judicial or administrative proceeding; as well as to support external and internal audit processes;
 - w. To eventually contact, by email, WhatsApp, or through any other electronic means or application, natural persons with whom it has or has had a relationship, such as, without this enumeration being limiting, employees and family members, shareholders, clients, suppliers, creditors and debtors, for the purposes mentioned above.

The purposes set forth herein shall be carried out in a proportionate, necessary and reasonable manner, in accordance with the relationship existing between the Data Subject and MARINE CONSULTANCY INSPECTIONS S.A.S. Under no circumstances shall Personal Data be processed for incompatible purposes, purposes that have not been communicated, or purposes unrelated to the legal, commercial, employment,

	STRATEGIC MANAGEMENT		Code: GE-PO-06
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY		Version: 02
			Date: 23-07-2026
			Page: 8 de 16

contractual or administrative relationship that gave rise to its collection.

9. Rights of Personal Data Subjects

Natural persons whose Personal Data is subject to Processing by the Company have the following rights, which may be exercised at any time:

- To know the Personal Data with respect to which the Company is carrying out Processing. Likewise, the Data Subject may request at any time that their Personal Data be updated or rectified, for example, if they find that their Personal Data is partial, inaccurate, incomplete, fragmented, misleading, or that its Processing is expressly prohibited or has not been authorized.
- To request proof of the authorization granted to the Company for the Processing of their Personal Data.
- To be informed by the Company, upon request, regarding the use that the Company has made of their Personal Data.
- To file complaints with the Superintendence of Industry and Commerce regarding violations of the provisions of the Personal Data Protection Law.
- To request the Company to delete their Personal Data and/or revoke the authorization granted for the Processing thereof, by submitting a claim, in accordance with the procedures established in Section 12 of this Policy. However, the request for deletion of the information and the revocation of the authorization shall not apply when the Data Subject has a legal or contractual obligation to remain in the Database and/or files, nor while the relationship between the Data Subject and the Company, pursuant to which their Personal Data was collected, remains in force.
- To access, free of charge, their Personal Data subject to Processing.

In accordance with Article 20 of Decree 1377 of 2013, the aforementioned rights may be exercised by:

- The Data Subject, who shall sufficiently prove their identity by the means established for such purpose.
- Their successors in title, who shall prove such capacity.
- The Data Subject's representative and/or attorney-in-fact, upon proof of the representation or power of attorney.
- By stipulation in favor of another person or for another person.

The rights of children and adolescents shall be exercised by the persons legally authorized to represent them.

10. Area Responsible for the Implementation and Compliance with this Policy

The HSEQ area is responsible for the development, implementation, training and oversight of this Policy. For this purpose, all employees or officers who carry out the Processing of Personal Data in the different areas of the Company are required to

 MCI MARINE CONSULTANCY INSPECTIONS Reliable Inspections, safe solution	STRATEGIC MANAGEMENT		Code: GE-PO-06
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY		Version: 02
			Date: 23-07-2026
			Page: 9 de 16

report such Databases to the Operations Management and to process any request, complaint or claim received from Data Subjects.

The HSEQ area has also been designated by the Company as the area responsible for handling requests, inquiries, complaints and claims, through which the Data Subject may exercise their rights to access, update, rectify and delete their Personal Data and revoke the authorization.

In accordance with Article 17 of Law 1581 of 2012, the Data Controller shall have the following duties:

- a. To guarantee the Data Subject, at all times, the full and effective exercise of the right to habeas data.
- b. To request and retain, under the conditions established in this Law, a copy of the respective authorization granted by the Data Subject.
- c. To duly inform the Data Subject of the purpose of the collection and the rights to which they are entitled by virtue of the authorization granted.
- d. To retain the information under the necessary security conditions to prevent its alteration, loss, consultation, use, or unauthorized or fraudulent access.
- e. To ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable.
- f. To update the information by promptly informing the Data Processor of any changes regarding the data previously provided to it, and to adopt the other necessary measures to ensure that the information provided to the Data Processor remains up-to-date.
- g. To rectify the information when it is incorrect and to communicate the relevant information to the Data Processor.
- h. To provide the Data Processor, as applicable, only with data whose Processing has been previously authorized in accordance with the provisions of this Law.
- i. To require the Data Processor, at all times, to respect the security and privacy conditions applicable to the Data Subject's information.
- j. To process inquiries and claims submitted in accordance with the terms established in this Law.
- k. To inform the Data Subject, upon request, of the use made of their Personal Data.
- l. To inform the data protection authority when violations of security codes occur and when there are risks in the administration of the Data Subjects' information.
- m. To comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.
- n. When MARINE CONSULTANCY INSPECTIONS S.A.S. acts as a Data Processor on behalf of third parties, to comply with the duties established in Article 18 of Law 1581 of 2012 and to process the information in accordance with the instructions of the Data Controller, the applicable contract and the authorized purposes.

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 10 de 16

11. Authorization

The Company shall obtain prior, express and informed authorization from the Data Subjects whose Personal Data it requires to process.

- a. **Prior Authorization** means that the consent must be granted by the Data Subject no later than at the time the Personal Data is collected.
- b. **Express Authorization** means that the Data Subject's consent must be explicit and specific; broad and non-specific authorizations shall not be valid. The Data Subject must expressly state their intention to authorize the Company to carry out the Processing of their Personal Data.

This expression of the Data Subject's intention may be provided through different mechanisms made available by the Company, such as:

- a. **In writing**, for example, by completing an authorization form such as the one provided in the annex
- b. When it is not possible to provide the Data Subject directly with this Personal Data Processing Policy, MARINE CONSULTANCY INSPECTIONS S.A.S. shall inform them, through a Privacy Notice, of the existence of this Policy, how to access it, the purposes of the Processing, the Data Subject's rights, and the channels available for exercising such rights.
- c. **Through unequivocal conduct** that allows it to be concluded that the Data Subject has granted their authorization, for example, through their express acceptance of the terms and conditions of an activity in which the authorization of the participants for the Processing of their Personal Data is required.

IMPORTANT: Under no circumstances shall the Company consider the Data Subject's silence as unequivocal conduct.

Regardless of the mechanism used by the Company, the authorization must be retained so that it may be consulted later.

- a. **Informed Authorization** means that at the time consent is requested from the Data Subject, the following information must be clearly provided:
 - The Personal Data that will be collected.
 - The identification and contact details of the Data Controller and the Data Processor.
 - The specific purposes of the intended Processing, that is, how and for what purposes the collection, use and circulation of the Personal Data will be carried out.
 - The rights to which the Data Subject is entitled as the holder of Personal Data; for this purpose, see Section 6 of this Policy.
 - The voluntary nature of the response to the questions asked when such questions concern Sensitive Data or the Personal Data of children and adolescents.

MARINE CONSULTANCY INSPECTIONS S.A.S. shall retain evidence of the

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 11 de 16

authorization granted by the Data Subjects through physical or electronic means, recordings, digital records, forms, contracts, templates, acceptance through platforms, or any other mechanism that allows such authorization to be consulted later.

Cases Where Authorization Is Not Required: The Data Subject's authorization shall not be required in the following cases: information requested by a public or administrative entity in the exercise of its legal functions or pursuant to a court order; data of a public nature; cases of medical or health emergencies; Processing authorized by law for historical, statistical or scientific purposes; or data related to the Civil Registry of Persons. In all cases, any person accessing the data shall comply with the applicable principles and duties regarding the protection of Personal Data.

12. Special Provisions for the Processing of Sensitive Personal Data

In accordance with the Personal Data Protection Law, data of a sensitive nature is considered to be data that affects privacy or whose improper use may lead to discrimination, such as data relating to:

- a. Racial or ethnic origin.
- b. Political orientation.
- c. Religious or philosophical beliefs.
- d. Membership in trade unions, social organizations, human rights organizations or political parties.
- e. Health.
- f. Sexual life.
- g. Biometric Data (such as fingerprints, signatures and photographs).
- h. The Processing of Sensitive Personal Data is prohibited by law, unless the prior, express and informed authorization of the Data Subject has been obtained, in accordance with Article 6 of Law 1581 of 2012 and Article 7 of Decree 1377 of 2013.

The Processing of Sensitive Personal Data is prohibited by law, unless the prior, express and informed authorization of the Data Subject has been obtained, in accordance with Article 6 of Law 1581 of 2012 and Article 7 of Decree 1377 of 2013.

- a. Inform the Data Subject that, due to the sensitive nature of the Personal Data, they are not required to authorize its Processing.
- b. Inform the Data Subject which of the data to be subject to Processing is considered Sensitive Personal Data and the purpose of the Processing.

IMPORTANT: No activity may be made conditional upon the Data Subject providing Sensitive Personal Data.

13. Special Provisions for the Processing of Personal Data of Children and Adolescents

 Reliable Inspections, safe solution	STRATEGIC MANAGEMENT		Code: GE-PO-06
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY		Version: 02
			Date: 23-07-2026
			Page: 12 de 16

In accordance with the provisions of Article 7 of Law 1581 of 2012 and Article 12 of Decree 1377 of 2013, the Company shall only carry out the Processing, that is, the collection, storage, use, circulation and/or deletion of Personal Data relating to children and adolescents, provided that such Processing serves and respects the best interests of children and adolescents and ensures respect for their fundamental rights.

Once the foregoing requirements have been met, the Company shall obtain the authorization of the legal representative of the child or adolescent, following the exercise by the minor of their right to be heard. Such opinion shall be assessed taking into account the minor's maturity, autonomy and ability to understand the matter.

14. Procedure for Handling and Responding to Requests, Inquiries, Complaints and Claims from Personal Data Subjects

Data Subjects whose Personal Data is being collected, stored, used or circulated by the Company may exercise, at any time, their rights to access, update, rectify and delete their information and revoke the authorization.

For this purpose, the following procedure shall be followed, in accordance with the Personal Data Protection Law:

14.1 Handling and Response to Requests and Inquiries

What does the procedure involve?

The Data Subject or their successors in title may request from the Company, through the means indicated below:

- Information regarding the Data Subject's Personal Data that is subject to Processing.
- Proof of the authorization granted to the Company for the Processing of their Personal Data.
- Information regarding the use that the Company has made of their Personal Data.

14.2 Means Available for the Submission of Requests and Inquiries

The Company has established the following means for receiving and handling requests and inquiries, all of which allow evidence of their submission to be retained:

- Communication addressed to: General Management.
- Request submitted by email to: inquiries@mci-sas.co

14.3 Handling and Response by the Company

The request shall contain, at a minimum, the Data Subject's identification, identification document, contact information, a clear description of the inquiry, and documents evidencing the capacity in which the person submitting the request is acting, when such person is not the Data Subject.

Requests and inquiries shall be handled within a maximum period of ten (10) business days from the date of receipt thereof. When it is not possible to handle the request or inquiry within such period, the interested party shall be informed, stating the reasons for the delay and indicating the date on which the request or inquiry will be handled,

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 13 de 16

which in no case may exceed five (5) business days following the expiration of the initial period.

15. Handling and Response to Complaints and Claims

What does the procedure involve?

The Data Subject or their successors in title may submit to the Company, through a complaint or claim filed using the channels indicated below:

- Correction or updating of the information.
- Deletion of their Personal Data or revocation of the authorization granted for the Processing thereof. It is essential to note that the request for deletion of the information and the revocation of the authorization shall not apply when the Data Subject has a legal or contractual obligation with MARINE CONSULTANCY INSPECTIONS S.A.S.
- Correction or remedy of the alleged failure to comply with any of the duties established in the Personal Data Protection Law.

The request shall contain a description of the facts giving rise to the complaint or claim, the applicant's address and contact information, and shall be accompanied by any documents that the applicant wishes to rely upon.

15.1 Means Available for the Submission of Complaints and Claims

The Company has established the following means for receiving and handling complaints and claims, all of which allow evidence of their submission to be retained:

- Communication addressed to MARINE CONSULTANCY INSPECTIONS S.A.S.
- Request submitted by email to: hseqcoordinator@mci-sas.co

15.2 Handling and Response by the Company

If the complaint or claim is submitted incomplete, the Company shall request the interested party, within five (5) days following receipt of the complaint or claim, to remedy the deficiencies. If two (2) months elapses from the date of such request without the applicant providing the required information, the applicant shall be deemed to have withdrawn the complaint or claim.

If the person receiving the complaint or claim is not competent to resolve it, they shall refer it to the Management of MARINE CONSULTANCY INSPECTIONS S.A.S. within a maximum period of two (2) business days and shall inform the interested party of such situation.

Once the complete complaint or claim has been received, a notation stating, "claim under review" and the reason for the claim shall be included in the Database within a period not exceeding two (2) business days. Such notation shall remain until the complaint or claim has been resolved.

The maximum period for handling the complaint or claim shall be fifteen (15) business days, counted from the day following the date of receipt thereof. When it is not possible

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 14 de 16

to handle the complaint or claim within such period, the interested party shall be informed of the reasons for the delay and the date on which the complaint or claim will be handled, which in no case may exceed eight (8) business days following the expiration of the initial period.

16. Passively Collected Information

When accessing or using the services available through the Company's websites, the Company may passively collect information through information management technologies, such as "cookies", through which information about the equipment's hardware and software, IP address, browser type, operating system, domain name, access time and the addresses of the websites from which the user accessed the Company's websites may be collected. The use of these tools does not directly collect Personal Data from users.

Information regarding the pages that a person visits most frequently on these websites may also be collected for the purpose of understanding their browsing habits. However, users of the Company's websites have the option to configure the operation of "cookies" according to the settings available in their Internet browser.

When the website uses cookies, analytics tools, tags, pixels or similar third-party technologies, the user shall be informed of their use, purpose and available mechanisms for configuring, accepting or rejecting them, as applicable.

17. Security of Personal Data

In strict application of the principle of security in the Processing of Personal Data, the Company shall implement the technical, human and administrative measures necessary to ensure the security of the records, preventing their alteration, loss, unauthorized consultation, use or access, or fraudulent access.

The Company's obligation and responsibility shall be limited to making adequate means available for this purpose. The Company does not guarantee the complete security of its information and shall not be liable for any consequences arising from technical failures or unauthorized access by third parties to the Database or files in which the Personal Data subject to Processing by the Company and its Data Processors is stored.

The Company shall require the service providers it engages in to adopt and comply with appropriate technical, human and administrative measures for the protection of Personal Data in relation to which such service providers act as Data Processors.

18. Transfer, Transmission and Disclosure of Personal Data

The Company may provide Personal Data to unrelated third parties when:

- They are contractors engaged in the performance of contracts for the development of the Company's activities;
- By transfer, under any title, of any line of business with which the information is related.

In all cases, the Personal Data transmission agreements entered into between the Company and the Data Processors shall require that the information be processed in accordance with this Policy and shall include the following obligations of the respective

	STRATEGIC MANAGEMENT	Code: GE-PO-06
		Version: 02
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY	Date: 23-07-2026
		Page: 15 de 16

Data Processor:

- a. To Process, on behalf of the Company, the Personal Data in accordance with the principles governing such data.
- b. To safeguard the security of the Databases containing Personal Data.
- c. To maintain confidentiality regarding the Processing of Personal Data.

Any transmission of Personal Data to national or international Data Processors shall be supported by agreements, contracts or clauses regulating the scope of the Processing, purposes, confidentiality obligations, security measures, restrictions on use, and return or deletion of the information. Where a transfer of data to another Data Controller takes place, such transfer shall be carried out in accordance with the Data Subject's authorization or the applicable legal exceptions.

19. Relevant Aspects of the Personal Data Processing Policy

Whenever Personal Data is provided by a third party, such third party must have the Data Subject's authorization allowing it to share the information with the Company or must be legally authorized to do so.

When information is requested by the Data Subject, whether through a request, inquiry or claim, regarding the manner in which their Personal Data is being used, the Company shall provide such information.

The policies established by the Company and by other companies or entities that belong or may in the future belong to the same control group and/or financial group, domiciled in Colombia and/or abroad, shall enter into force upon publication and may be modified at any time to adapt them to future legislative or jurisprudential developments, as well as to industry practices. Any modification shall be made in accordance with the applicable legislation in force and shall enter into force and take effect upon publication through the mechanisms established by the Company so that Data Subjects may become aware of the Personal Data Processing Policy and any changes made thereto.

The Company shall apply its Personal Data Processing policies more rigorously when the Personal Data of children and adolescents is involved, ensuring the protection of their fundamental rights. Likewise, their best interests and the prevalence of their rights shall be taken into account.

The Company may exchange Personal Data with governmental or public authorities, such as tax administrative authorities, investigative bodies and judicial authorities, when requested in the exercise of their functions.

Personal Data subject to Processing shall be handled using all necessary human and technical measures for its protection, ensuring that such information cannot be copied, altered, deleted, consulted or otherwise used without authorization or for fraudulent purposes.

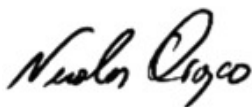
Any substantial change to this Policy shall be communicated in a timely manner to the Data Subjects through the channels established by the Company, prior to its implementation, when such change affects the purposes, rights, channels for handling

	STRATEGIC MANAGEMENT		Code: GE-PO-06
	PROCESSING AND PROTECTION OF PERSONAL DATA POLICY		Version: 02
			Date: 23-07-2026
			Page: 16 de 16

requests, Data Controllers, Data Processors, transfers, transmissions or relevant conditions of the Processing.

This Policy was reviewed and approved on September 12, 2024. The Databases managed by MARINE CONSULTANCY INSPECTIONS S.A.S. shall remain in effect for the period necessary to fulfill the purposes that justified their Processing, the applicable legal, contractual, accounting, tax, labor, administrative or judicial obligations, and the corresponding document retention periods. Once such purposes have been fulfilled, the data shall be deleted, anonymized or retained only when there is a legal or contractual obligation that justifies its retention.

If MARINE CONSULTANCY INSPECTIONS S.A.S. is required to register its Databases in the National Database Registry (RNBD), it shall comply with such obligation and carry out the corresponding updates in accordance with the instructions issued by the Superintendence of Industry and Commerce.



NICOLAS OROZCO PALMA
General Manager