

POLICY FOR THE PROTECTION OF PERSONAL DATA OF PLANTAS Y BULBOS S.A.S. NIT 830114847-2

BACKGROUND AND PURPOSE OF THIS POLICY

PLANTAS Y BULBOS S.A.S., identified with NIT 830.114.847-2, is a private company, constituted as a legal entity on January 15, 2003. PLANTAS Y BULBOS S.A.S. adopts and publishes its Personal Data Processing Policy, defining the general guidelines for the protection and processing of personal data of its Customers, Suppliers, Employees (staff), shareholders, and third parties, by virtue of the commercial activities developed by PLANTAS Y BULBOS S.A.S.

PLANTAS Y BULBOS S.A.S. voluntarily adopts this Personal Data Protection Policy, which establishes the organizational conditions, obligations of those involved and intervening in the treatment and use of personal information, operational regime, and applicable procedures for the processing of personal data that, in the development of its functions as a company for the marketing of agricultural products and agricultural assistance services, it must request, use, store, correct, transfer, or delete.

PLANTAS Y BULBOS S.A.S. is the entity responsible for the processing of Personal Data and, in compliance with Article 2.2.2.25.3.1 of Decree No. 1074 of 2015, adopts and makes public to all interested parties this document that contains all the essential, simple, and secure elements for compliance with the corresponding Colombian legislation on Personal Data Protection. Likewise, this document will serve as a reference for all sectors of interest that maintain any type of relationship with PLANTAS Y BULBOS S.A.S., contributing to the correct knowledge and guarantee of the fundamental right to Personal Data Protection and so that this Policy can be used in different fields of application.

****Identification data****: PLANTAS Y BULBOS S.A.S. is identified with NIT 830.114.847-2.

****Contact information****: Cra 7 N 80 - 49 office 401 Bogotá, Customer service phone numbers Bogotá (601) 567 9208, email: administracion@plantasybulbos.com, Website: www.plantasybulbos.com

****SCOPE****

This Personal Data Processing and Protection Policy will be applied to all databases and/or files that include personal data that are subject to processing by PLANTAS Y BULBOS S.A.S., as the entity responsible for the processing of personal data.

****2. DEFINITIONS****

****Authorization****: Refers to the prior, express, and informed consent of the Data Subject for the Controller, or its Processors (duly authorized by the Controller) to carry out the Processing of the Data Subject's Personal Data.

****Privacy Notice****: It is the physical, electronic, or any other format document, generated by the controller, that has been made available to the Data Subject for the Processing of their Personal Data, which informs the Data Subject of the existence of the Personal Data Processing Policies that will be applicable to them, how to access them, and the characteristics of the Processing that is intended to be given to the Personal Data.

****Habeas Data****: The right that every person has to know, update, and rectify the information that has been collected about them in public or private databases.

****Database****: Consists of an organized set of Personal Data that are subject to Processing and includes physical and electronic files.

****Personal Data****: According to Law 1581 of 2012, it is any information linked or that can be associated with one or several determined or determinable natural persons.

****Public Data****: Personal Data classified as public by law or the Political Constitution. Public data includes, among others, data related to the civil status of individuals, their profession or trade, their status as a merchant or public servant.

****Sensitive Data****: Personal Data whose use affects the privacy of the Data Subject or whose improper use may generate discrimination, such as those revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, human rights organizations or promoting interests of any political party or guaranteeing the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.

****Processor****: A natural or legal person, public or private, that by itself or in association with others, carries out the Processing of personal data on behalf of the Controller.

****Controller****: A natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the Processing of data.

****Data Subject****: A natural person whose personal data is subject to Processing.

****Processing****: Any operation or set of operations on Personal Data, such as collection, storage, use, circulation, or deletion.

****Transfer****: The transfer of data occurs when the Controller and/or Processor of personal data sends information or personal data to a recipient, who in turn is responsible for the Controller's account and is located inside or outside the country.

****Transmission****: The processing of Personal Data that involves the communication of the same inside or outside the territory of the Republic of Colombia when its purpose is the realization of Processing by the Processor on behalf of the Controller.

****3. GENERAL ROLES AND RESPONSIBILITIES WITHIN THE ORGANIZATION****

PLANTAS Y BULBOS S.A.S. has an administrative and operational structure within the Organization, responsible for the management and protection of personal data. The administration, control, and monitoring of the process are in charge of the Information Security area and the Internal Control area. For the operation of the process, the role of "Personal Data Protection Assistant" has been defined, who is responsible for handling requests, consultations, and claims, before whom the rights to know, update, rectify, and delete data and revoke authorization can be exercised.

****3.1 DUTIES OF PLANTAS Y BULBOS S.A.S. AS THE CONTROLLER OF PERSONAL DATA PROCESSING****

PLANTAS Y BULBOS S.A.S. as the controller of personal data processing, will comply with the following duties:

- a. Guarantee the Data Subject, at all times, the full and effective exercise of the right to habeas data.
- b. Request and keep, in good condition, a copy of the authorization granted by the Data Subject.
- c. Properly inform the Data Subject about the purpose of the collection of personal data and the rights they have by virtue of the authorization granted.
- d. Keep the information under the necessary security conditions to prevent its alteration, loss, unauthorized or fraudulent consultation, use, or access.
- e. Rectify the information when it is incorrect.
- f. Process queries and claims made under the terms indicated by Statutory Law 1581 of 2012 and other current regulations.
- g. Inform, upon request of the Data Subject, about the use given to their data.
- h. Inform the data protection authority when there are violations of security codes and risks in the administration of the Data Subjects' information.
- i. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

****3.2 AUTHORIZATION****

****COLLECTION OF PERSONAL DATA.**** In the development of the principles of purpose and freedom, the collection of data is limited to those personal data that are pertinent and adequate for the purpose for which they are collected or required according to current regulations. PLANTAS Y BULBOS S.A.S. cannot collect personal data without the authorization of the Data Subject. At the request of the Superintendence of Industry and Commerce, PLANTAS Y BULBOS S.A.S. or its Processors (if one is designated) must provide

a description of the procedures used for the collection, storage, use, circulation, and deletion of information, as well as a description of the purposes for which the information is collected.

****AUTHORIZATION.**** PLANTAS Y BULBOS S.A.S. as the Controller has adopted certain procedures to request, no later than at the time of data collection, the Data Subject's authorization for the Processing of their data and to inform them of the personal data that will be collected and all the specific purposes of the Processing for which consent is obtained.

****PROOF OF AUTHORIZATION.**** PLANTAS Y BULBOS S.A.S. as the controller of personal data processing keeps proof of the authorization granted by the Data Subjects.

****REVOCATION OF AUTHORIZATION AND/OR DELETION OF DATA.**** Data Subjects may, at any time, request PLANTAS Y BULBOS S.A.S. or the Processor (if one is designated), to delete their personal data and/or revoke the authorization granted for the Processing of the same, by submitting a claim.

****DATA COLLECTED BEFORE THE ISSUANCE OF DECREE 1377 OF 2013.**** PLANTAS Y BULBOS S.A.S. must request authorization from the Data Subjects to continue Processing their personal data, as well as inform them of the Information Processing Policy and how to exercise their rights. When it is impossible to request consent from each Data Subject for the Processing of their personal data, inform them of the Information Processing Policy and how to exercise their rights; PLANTAS Y BULBOS S.A.S. may implement alternative mechanisms such as local newspapers or magazines, the company's website, information posters located at the company's facilities, among others, and inform the Superintendence of Industry and Commerce about this within five (5) days following its implementation.

****3.3 PRIVACY NOTICE.**** In cases where it is not possible to make the Data Subject aware of the information processing policies, PLANTAS Y BULBOS S.A.S. must inform the Data Subject through a Privacy Notice about the existence of the Policy, how to access it, and the purposes of

the Processing intended for the collected personal data.

****Means of disseminating the Privacy Notice and Information Processing policies.**** PLANTAS Y BULBOS S.A.S. can use documents, electronic formats, verbal means, or any other technology, as long as it guarantees and fulfills the duty to inform the Data Subject.

****3.4 Events in which authorization is not necessary.****
The Data Subject's authorization is not necessary when:

a. Information is 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 sanitary urgency;
- d. Processing of information authorized by law for historical, statistical, or scientific purposes;
- e. Data related to the Civil Registry of persons.

****4. PROCESSING TO WHICH PERSONAL DATA WILL BE SUBJECTED AND PURPOSES****

The personal data of Customers, Suppliers, shareholders, Employees (staff), and third parties collected or recorded in the databases of PLANTAS Y BULBOS S.A.S., will be processed according to the guiding principles for Personal Data Processing and the provisions contained in Law 1581 of 2012 and will be equally applicable to databases shared or transferred to PLANTAS Y BULBOS S.A.S. by third parties.

For the purposes described below, PLANTAS Y BULBOS S.A.S. may collect, transmit, store, use, process, share, transfer, transmit, and safeguard the personal data of the Data Subjects; as the Controller, it directly handles the processing of the data or entrusts a third party with a commercial link to the company, whether operating or not in another country, to provide any service that may be provided according to the following purposes and those authorized by the Data Subjects.

****4.1 Purposes of personal data processing****

PLANTAS Y BULBOS S.A.S. will use the personal data of the Data Subject –Customer– for the following purposes:

- a. For the development of commercial activities.
- b. For issuing quotes, invoices, delivery notes, purchase orders, and other documents as proof of a transaction.
- c. To perfect or finalize the payment of a product or service acquired by the Data Subject.
- d. For the dispatch of orders and provision of services contracted by the Data Subject, as well as the process of evaluation and subsequent rating of the quality of the service provided.
- e. Handling of warranty procedures and product returns.
- f. Responding to inquiries about offered products and services, requests, complaints, and claims.
- g. Conducting studies for statistical purposes, measuring customer satisfaction, and customer knowledge.
- h. Receiving information on news, products, services, inherent to the corporate purpose of PLANTAS Y BULBOS S.A.S.
- i. Provision of telephone service, collections, or others of a similar nature.
- j. Execution of accounting and tax processes and procedures.
- k. Compliance with security protocols established by PLANTAS Y BULBOS S.A.S.
- l. Compliance with contractual decisions, for which information may be transferred to third parties, such as financial entities, notaries, lawyers.

- m. Compliance with judicial decisions and administrative, legal, fiscal, and regulatory provisions.
- n. Transmission of information and personal data in audit processes.
- o. Creation of the client in the company's software.
- p. Developing commercial and marketing activities, such as usage analysis, customer profiling, brand tracking, sending benefits, advertising, offers, news, discounts, customer loyalty programs, market research, generating campaigns and events, and other news of interest.
- q. Creation of databases according to the characteristics and profiles of the personal data holders.
- r. Compliance with legal obligations by PLANTAS Y BULBOS S.A.S., including but not limited to: the reversal of transactions under Consumer Protection regulations; the execution of transaction contracts to prevent litigation, among others.
- s. Additionally, for any other purpose duly authorized by the Customers.

PLANTAS Y BULBOS S.A.S. will process the personal data of the Data Subject (Supplier, Contractors, and third parties) for the following purposes:

Plantas y Bulbos S.A.S. collects the personal data of its suppliers, contractors, and third parties and stores it in a database, which, although mostly composed of public data, is classified by the company as reserved. In the case of private data, the company will only reveal it with the express authorization of the Data Subject or when requested by a competent authority. The purposes for which the personal data of Suppliers, contractors, or third parties of PLANTAS Y BULBOS S.A.S. are used are:

- a. For the normal development of the commercial and contractual relationship maintained with PLANTAS Y BULBOS S.A.S., and the fulfillment of obligations acquired by virtue of said relationship.
- b. Provision of services offered to PLANTAS Y BULBOS S.A.S.
- c. Accounting, tax processes, invoice payment, and legal matters before public entities, regulators, and others.
- d. Study and delivery of donation development from PLANTAS Y BULBOS S.A.S. to foundations, according to internally established policies for this purpose.
- e. Development of corporate communication services.
- f. Judicial representation of the company.
- g. Services related to environmental management.
- h. Consultations, audits, and reviews derived from the business relationship with the supplier, contractor, or third party.
- i. Verifying the identity of the Data Subject, performing security protocols to prevent and mitigate the risk of fraud, money laundering, and/or terrorism financing.
- j. Additionally, for any other purpose duly authorized by the Supplier, Contractor, and third parties.

PLANTAS Y BULBOS S.A.S. will process the personal data of the Data Subject (Shareholders) for the following purposes:

- a. For the normal development of the corporate and contractual relationship maintained with PLANTAS Y BULBOS S.A.S., and the fulfillment of obligations acquired by virtue of said relationship.
- b. Accounting, tax processes, payment of dividends, and contributions made.
- c. Additionally, for any other purpose duly authorized by the shareholder.

PLANTAS Y BULBOS S.A.S. uses employee (staff) data for compliance with the following purposes, including but not limited to:

- a. Compliance with legal or contractual obligations of the employee and PLANTAS Y BULBOS S.A.S. with third parties.
- b. Proper execution of the employment contract.
- c. Participation in promotion, development, and growth processes of the employee.
- d. Procedures before health providers, Severance Funds, and pensions, ARL.
- e. Compliance with the employee's legal and regulatory obligations.
- f. Management of information and communication systems.
- g. Generating copies and security files of information on the equipment provided by PLANTAS Y BULBOS S.A.S.
- h. Offering additional benefits to the employee.
- i. Fraud and money laundering prevention and control.
- j. Mechanisms and security protocols of PLANTAS Y BULBOS S.A.S. facilities, conducting surveys (commercial, academic, or any other kind).
- k. Taking images, photographs, and fingerprints necessary for worker recognition, compliance control, and evidence collection of developed services.
- l. Communicating worker information to third-party entities with which PLANTAS Y BULBOS S.A.S. maintains a contractual relationship, as well as to suppliers, collaborators, shareholders, and clients as necessary, to comply with the third party's protocol, solely to enable them to manage control and coordination regarding personnel who effectively provide services derived from the contractual relationship, as well as to enable compliance with legal obligations, in fiscal and social security matters.
- m. Communicating employee identification data to travel agencies, transportation companies, hotels, car rental companies, to manage reservations and settle expenses incurred.
- n. Initiating internal investigations based on complaints filed by customers, third parties, or the workers themselves.
- o. Verifying the identity of the Data Subject, conducting security studies, and/or applying security protocols to prevent and mitigate the risk of fraud, money laundering, and/or terrorism financing.
- p. All purposes compatible with the execution of the employment contract.
- q. Additionally, for any other purpose duly authorized by the employee.

PLANTAS Y BULBOS S.A.S. stores the personal data of its employees, including those obtained during the selection process, and keeps them in a folder identified with each employee's name. This folder is accessible only to the Human Resources Department and

is used to manage the contractual relationship between PLANTAS Y BULBOS S.A.S. and the employee.

Similarly, it will have security measures for handling sensitive data and its confidentiality, understanding that such sensitive data will only be used by PLANTAS Y BULBOS S.A.S. for purposes strictly related to the employment relationship. The company will store all personal data obtained from the selection process and documentation generated during the employment relationship in its central archive with restricted access, always subjecting the information to appropriate security measures and levels, given that employment information may contain sensitive data. This information will not be subject to processing for a period exceeding twenty-nine (29) years from the end of the employment relationship or according to legal or contractual circumstances that necessitate information management.

During the company's personnel selection processes, PLANTAS Y BULBOS S.A.S. will conduct internal and external administrative management to execute the selection process, send scheduled communications for various selection tests, verify the applicant's employment, academic and personal references, conduct the hiring process for selected personnel, verify the identity of the Data Subject, conduct security studies and/or apply security protocols to prevent and mitigate the risk of fraud, money laundering, and/or terrorism financing. Information collected from non-selected applicants will be destroyed within a period not exceeding 5 months.

****4.2 Transfer of Data to Third Countries****

When data is sent or transferred to another country, the authorization of the Data Subject of the information being transferred must always be obtained. Unless otherwise authorized by law, prior, express, and unequivocal authorization of the Data Subject is required for international data circulation. In this sense, before sending personal data to another country

, those obliged to comply with this policy must verify that they have the prior, express, and unequivocal authorization of the Data Subject allowing the transmission of their personal data.

Such transfer of personal data is carried out only to third parties with whom PLANTAS Y BULBOS S.A.S. has a contractual, commercial, and/or legal relationship through a data transmission contract. The contract signed by PLANTAS Y BULBOS S.A.S. with the processor (if one is designated) for the processing of personal data under its control and responsibility will specify the scope of the Processing, the activities the Processor will perform on behalf of PLANTAS Y BULBOS S.A.S. for data processing, and the Processor's obligations (if one is designated) towards the Data Subject and PLANTAS Y BULBOS S.A.S.

Similarly, the Processor (if one is designated) of personal data processing must safeguard the security of the databases containing personal data and maintain their confidentiality.

It is prohibited to transfer personal data of any kind to countries that do not provide adequate levels of data protection (a country is considered to offer an adequate level of data protection when it complies with the standards set by the Superintendence of Industry and Commerce on the subject).

****4.3 Handling of sensitive data****

PLANTAS Y BULBOS S.A.S. will not collect, use, or process sensitive data unless the Data Subject of the same issues express authorization for such processing or in cases where the law determines that such authorization is not required.

****5. RIGHTS OF THE DATA SUBJECTS****

Data Subjects of the Personal Data registered in the databases of PLANTAS Y BULBOS S.A.S. have the following rights, contained in Law 1581 of 2012 and its Regulatory Decree:

- a. To know, update, correct, and/or delete their personal data from the Controllers or Processors (if one is designated) of the processing. These rights may be exercised, among others, against partial, inaccurate, incomplete, fragmented data that induces error, or those whose Processing is expressly prohibited or not authorized.
- b. To request proof of the Authorization granted to PLANTAS Y BULBOS S.A.S., except when expressly exempted as a requirement for Processing, as provided in Article 10 of Law 1581 of 2012.
- c. To be informed about the use given to their Personal Data by PLANTAS Y BULBOS S.A.S. or the Processor (if one is designated) of the Processing, upon request, regarding the use of their personal data.
- d. To revoke the authorization and/or request the deletion of the data when the Processing does not respect constitutional and legal principles, rights, and guarantees. The revocation and/or deletion will proceed when the Superintendence of Industry and Commerce has determined that PLANTAS Y BULBOS S.A.S. or its Processor (if one is designated) has engaged in conduct contrary to the Law and the Constitution.
- e. To access for free their Personal Data that has been subject to Processing, according to the procedure provided by PLANTAS Y BULBOS S.A.S. for this purpose.
- f. To file complaints with the Superintendence of Industry and Commerce (or its equivalent) for violations of the provisions of the Law and other norms that modify, add, or complement it.

****5.1 RIGHTS OF CHILDREN AND ADOLESCENTS****

In the processing of personal data, PLANTAS Y BULBOS S.A.S. ensures respect for the prevailing rights of children and adolescents. The Processing of personal data of children and adolescents is prohibited, except for data of a public nature.

****6. CONSULTATION AND CLAIM PROCEDURE****

****CONSULTATION****

Data Subjects or their successors may consult the personal information of the Data Subject held in the databases of PLANTAS Y BULBOS S.A.S., which, as the processor (if one is designated) of the Processing, must provide all the information contained in the individual record or linked to the Data Subject's identification. The consultation will be made in writing by submitting the form (FC-006 provided by the company's management assistant) at the facilities of PLANTAS Y BULBOS S.A.S. The consultation will be addressed within a maximum term of ten (10) business days from the date of receipt. When it is not possible to address the consultation within this period, the interested party will be informed, expressing the reasons for the delay and indicating the date when the consultation will be addressed, which in no case may exceed five (5) business days following the expiration of the first term.

****CLAIMS****

The Data Subject or their successors who consider that the information contained in a database should be corrected, updated, or deleted, or when they notice an alleged breach of any of the duties contained in the Law, may file a claim with PLANTAS Y BULBOS S.A.S. as the Controller of the Processing or the Processor (if one is designated), which will be processed under the following rules:

a. The claim is formulated by completing the entire FC-004 form (provided by the company's management assistant) addressed to PLANTAS Y BULBOS S.A.S. or the Processor (if one is designated) of the Processing, with the identification of the Data Subject, a description of the facts giving rise to the claim, the address, and accompanying documents to be relied upon. If the claim is incomplete, the interested party will be required within five (5) days of receiving the claim to correct the deficiencies. Two (2) months after the request date, if the applicant has not provided the required information, it will be understood that they have withdrawn the claim.

In the case that the recipient of the claim is not competent to resolve it, it will be forwarded to the appropriate party within a maximum term of two (2) business days and the interested party will be informed of the situation.

b. Once the complete claim is received, a legend stating "CLAIM IN PROCESS" and the reason for the claim will be included in the database within a term not exceeding two (2) business days. This legend must be maintained until the claim is resolved.

c. The maximum term to address the claim will be fifteen (15) business days from the day following the receipt date. When it is not possible to address the claim within this term, the Data Subject will be informed of the reasons for the delay and the date when the claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

****7. IDENTIFICATION OF DATABASES AND PERIOD OF VALIDITY****

The databases under treatment by PLANTAS Y BULBOS S.A.S. are those established in the internal manual of policies and procedures on Data Protection and will be stored for a term of ten (10) years from the date of the last treatment, to allow PLANTAS Y BULBOS S.A.S. to fulfill its legal and/or contractual obligations, especially in accounting, tax, and fiscal matters.

****8. TEMPORARY LIMITATIONS TO PERSONAL DATA PROCESSING****

PLANTAS Y BULBOS S.A.S. as the Controller and its Processors (if one is designated) of the Processing may only collect, store, use, or circulate personal data for the time that is reasonable and necessary, according to the purposes that justified the Processing, considering the applicable provisions on the matter and the administrative, accounting, tax, legal, and historical aspects of the information. Once the purpose(s) of the Processing have been fulfilled and without prejudice to legal norms that stipulate otherwise, PLANTAS Y BULBOS S.A.S. and the Processor (if one is designated) must proceed to delete the personal data in their possession. However, personal data must be retained when required to comply with a legal or contractual obligation.

PLANTAS Y BULBOS S.A.S. or its Processors (if one is designated) of the Processing must document the procedures for the Processing, conservation, and deletion of personal data in accordance with the applicable provisions on the matter, as well as the instructions issued by the Superintendence of Industry and Commerce.

****8.1 INFORMATION SECURITY AND SECURITY MEASURES****

In the development of corporate policies and the principle of security established in current regulations, PLANTAS Y BULBOS S.A.S. adopted the necessary technical, human, and administrative measures to provide security standards to the records, preventing their alteration, loss, unauthorized or fraudulent consultation, use, or access. The security policies in the matter of information are those expressed in the "Internal manual of policies and procedures in the matter of Personal Data Protection."

****9. VALIDITY AND UPDATE OF POLICIES****

As a general rule, the term of the authorizations for the use of personal data by customers and/or users is understood to be for the term of the commercial relationship or service linkage.

Authorizations on customer and/or user data may end at the will of the same at any time. If the person is an active customer of PLANTAS Y BULBOS S.A.S., their data cannot be used for anything other than providing the product or service and offering subsequent renewals when the service has this modality.

Any substantial change in the Treatment policies will be communicated promptly to the Data Subjects through the usual contact means and/or through:

a. Email sent to the Data Subjects.

b. For Data Subjects who do not have access to electronic means or those who cannot be contacted, it will be communicated at the company's headquarters.

Communications to the Data Subjects will be sent at least ten (10) days before implementing the new policies and/or substantial updates to the same. This Policy is effective from the first (1st) of March two thousand twenty-five (2025).

LUIS MARIANO BOTERO IRIARTE
Legal Representative