

PERSONAL DATA PROTECTION POLICY OF PLANTAS Y BULBOS S.A.S. NIT 830.114.847-2

1. BACKGROUND AND PURPOSE OF THIS POLICY.

PLANTAS Y BULBOS S.A.S., identified with NIT 830.114.847-2, is a private company, incorporated 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, Collaborators (staff), shareholders and third parties, by virtue of the commercial activities carried out 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 in the processing and use of personal information, operating rules, and applicable procedures for the processing of personal data that, in the development of its own functions as a company commercializing agricultural products and agricultural assistance services, it may need to collect, 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 containing all the essential, straightforward and security elements for compliance with Colombian legislation on the Protection of Personal Data. This document will also 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 proper understanding and guarantee of the fundamental right to Personal Data Protection.

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

Contact details: Cra 7 N 80-49, Office 401, Bogotá. Customer service phone: 3103047748.
Email: administracion@plantasybulbos.com. Website: www.plantasybulbos.com

SCOPE: This Personal Data Processing and Protection Policy shall apply to all databases and/or files that include personal data subject to processing by PLANTAS Y BULBOS S.A.S. as the data controller.

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: A physical, electronic or other format document generated by the Controller, made available to the Data Subject for the Processing of their Personal Data, which communicates information regarding the existence of the applicable Personal Data Processing Policies, how to access them, and the characteristics of the intended processing.

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

Database: An organized set of Personal Data subject to Processing, including physical and electronic files.

Personal Data: Under Law 1581 of 2012, any information linked to or that can be associated with one or more determined or determinable natural persons.

Public Data: Personal Data classified as public by law or the Political Constitution. Public data includes, among others, data relating to a person's civil status, profession or occupation, and 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 lead to discrimination, such as data revealing fingerprints, videos, photographs, biometrics, racial or ethnic origin, political views, religious or philosophical beliefs, membership in trade unions, social or human rights organizations, or data relating to health, sexual life and biometric data.

Data Processor: A natural or legal person, public or private, who alone or in association with others, processes personal data on behalf of the Data Controller.

Data Controller: A natural or legal person, public or private, who alone 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: Occurs when the Controller and/or Processor sends information or personal data to a recipient who is also a Controller, whether located inside or outside the country.

Transmission: Processing of Personal Data that involves the communication thereof within or outside the territory of the Republic of Colombia, when its purpose is for the Processor to carry out Processing 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 responsible for the management and protection of personal data. Administration, control and monitoring are handled by the Information Security area and the Internal Control area. The role of "Personal Data Protection Assistant" has been defined, responsible for handling petitions, queries and complaints through which Data Subjects may exercise their rights to know, update, rectify and delete their data, and to revoke authorization.

3.1. DUTIES OF PLANTAS Y BULBOS SAS AS DATA CONTROLLER

PLANTAS Y BULBOS S.A.S. as the data controller shall fulfill the following duties:

- a) Guarantee the Data Subject, at all times, the full and effective exercise of the right of habeas data.
- b) Request and retain, in good condition, a copy of the authorization granted by the Data Subject.
- c) Properly inform the Data Subject of the purpose of collecting their personal data and the rights they are entitled to.
- d) Retain information under the security conditions necessary to prevent its adulteration, loss, unauthorized or fraudulent access or use.
- e) Rectify information when it is incorrect.
- f) Process queries and complaints within the timeframes set by Statutory Law 1581 of 2012 and other applicable regulations.
- g) Inform the Data Subject, upon request, of the use given to their data.
- h) Inform the data protection authority when security breaches occur and risks exist in the management of 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. Data collection is limited to personal data that is pertinent and adequate for the purpose for which it is collected or required under applicable regulations. PLANTAS Y BULBOS S.A.S. may not collect personal data without the Data Subject's authorization.

AUTHORIZATION. PLANTAS Y BULBOS S.A.S. has adopted 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, as well as all the specific purposes of the Processing.

PROOF OF AUTHORIZATION. PLANTAS Y BULBOS S.A.S. retains proof of the authorization granted by Data Subjects.

REVOCAION OF AUTHORIZATION AND/OR DATA DELETION. Data Subjects may at any time request PLANTAS Y BULBOS S.A.S. or the Processor to delete their personal data and/or revoke the authorization granted for its Processing, by filing a complaint.

DATA COLLECTED BEFORE DECREE 1377 OF 2013. PLANTAS Y BULBOS S.A.S. must request authorization from Data Subjects to continue processing their personal data and inform them of the Data Processing Policy and how to exercise their rights. When this is not possible, PLANTAS Y BULBOS S.A.S. may implement alternative mechanisms such as local newspapers, its website, or informational posters at its premises, and shall report this to the Superintendence of Industry and Commerce within five (5) business days of implementation.

3.3. PRIVACY NOTICE.

In cases where it is not possible to make the processing policies available to the Data Subject, PLANTAS Y BULBOS S.A.S. must inform the Data Subject through a Privacy Notice of the existence of the Policy, how to access it, and the purposes of the intended Processing. PLANTAS Y BULBOS SAS may use documents, electronic formats, verbal means or any other technology, provided it fulfills its duty to inform the Data Subject.

3.4. Events in which authorization is not required.

Authorization from the Data Subject will not be required when dealing with:

- 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) Processing of information authorized by law for historical, statistical or scientific purposes;
- e) Data related to the Civil Registry of individuals.

4. PROCESSING TO WHICH PERSONAL DATA WILL BE SUBJECT AND PURPOSES.

Personal data of Customers, Suppliers, shareholders, Collaborators (staff) and third parties held in the databases of PLANTAS Y BULBOS S.A.S. shall be processed in accordance with Law 1581 of 2012 and shall equally apply to databases shared with 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 and safeguard the personal data of Data Subjects; as the Controller,

handling processing directly or entrusting it to a third party with a commercial relationship with the company.

4.1. Purposes of personal data processing.

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

- a) For the development of commercial activities.
- b) For the issuance of quotations, invoices, remittance notes, purchase orders and other transaction documents.
- c) To complete or execute payment for a product or service acquired by the Data Subject.
- d) For the dispatch of orders, provision of services, and evaluation of service quality.
- e) Handling of warranty claims and product returns.
- f) Issuing responses to inquiries, petitions, complaints and claims.
- g) Conducting studies for statistical purposes and measuring customer satisfaction.
- h) Sending information about news, products and services related to the company's corporate purpose.
- i) Provision of telephone customer service, collections or similar services.
- j) Execution of accounting and tax processes and procedures.
- k) Compliance with security protocols established by PLANTAS Y BULBOS S.A.S.
- l) Fulfillment of contractual decisions, including transfer of information to financial institutions, notaries, and attorneys.
- m) Compliance with court decisions and administrative, legal, tax and regulatory provisions.
- n) Transmission of information and personal data in audit processes.
- o) Creation of the customer in the company's software.
- p) Developing commercial and marketing activities, including customer profiling, brand tracking, advertising, discounts, loyalty programs, market research and events.
- q) Creation of databases based on the characteristics and profiles of Data Subjects.
- r) Compliance with legal obligations including transaction reversals under Consumer Protection regulations.
- s) Additionally, for any other purpose duly authorized by Customers.

PLANTAS Y BULBOS S.A.S. will process Supplier, Contractor and third-party personal data for the following purposes:

Plantas y Bulbos SAS collects and stores this data in a database classified as confidential. Private data will only be disclosed with the express authorization of the Data Subject or when requested by a competent authority. Purposes include:

- a) Normal development of the commercial and contractual relationship with PLANTAS Y BULBOS S.A.S.
- b) Provision of services offered to PLANTAS Y BULBOS S.A.S.
- c) Accounting, tax, invoice payment and legal processes.
- d) Study and delivery of donations to foundations, per internal policies.
- e) Development of corporate communications services.
- f) Legal representation of the company.

- g) Matters related to environmental management services.
- h) Queries, audits and reviews arising from the business relationship.
- i) Verifying the identity of the Data Subject and implementing security protocols to prevent fraud and money laundering.
- j) Additionally, for any other purpose duly authorized by the Supplier, Contractor or third party.

PLANTAS Y BULBOS S.A.S. will process Shareholder personal data for the following purposes:

- a) Normal development of the corporate and contractual relationship with PLANTAS Y BULBOS S.A.S.
- b) Accounting, tax processes, payment of dividends and contributions.
- c) Additionally, for any other purpose duly authorized by the shareholder.

PLANTAS Y BULBOS S.A.S. uses Collaborator (staff) data for the following purposes:

- a) Fulfillment of 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.
- d) Procedures before health service providers, Severance and Pension Funds, and Occupational Risk Insurers (ARL).
- e) Fulfillment of legal and regulatory obligations of the employee.
- f) Administration of information and communications systems.
- g) Generation of backup copies and security archives on company-provided equipment.
- h) Offering extra-legal benefits to the employee.
- i) Fraud prevention and anti-money laundering control.
- j) Security mechanisms and protocols for the company's facilities, and preparation of surveys.
- k) Taking images, photographs and fingerprints for employee identification, compliance monitoring and evidence collection.
- l) Communicating employee information to third-party entities with contractual relationships with the company for control and coordination of personnel and compliance with legal, tax and social security obligations.
- m) Communicating employee identifying data to travel agencies, transportation companies, hotels and vehicle rental entities for reservations and expense settlement.
- n) Initiating internal investigations based on complaints filed by clients, third parties or employees.
- o) Verifying the identity of the Data Subject and applying security protocols to prevent fraud and money laundering.
- p) All purposes compatible with the execution of the employment contract.
- q) Additionally, for any other purpose duly authorized by the Collaborator (employee).

PLANTAS Y BULBOS S.A.S. stores employee personal data, including data from the selection process, in a folder identified by each employee's name, accessible only to the Human Resources Department. Sensitive data will only be used for purposes strictly related to the employment relationship. This information shall not be processed for a period exceeding **twenty (20) years**

from the termination of the employment relationship, or as required by legal or contractual circumstances.

Information collected during the selection process for **unselected applicants** will be destroyed within a period not exceeding **5 months**.

4.2. Transfer of Data to Third Countries

Authorization from the Data Subject is always required before sending or transferring data to another country. Such transfer shall be carried out only to third parties with whom PLANTAS Y BULBOS S.A.S. has a contractual, commercial and/or legal relationship through a personal data transmission agreement. The Processor must safeguard the security of databases containing personal data and maintain their confidentiality.

The transfer of personal data to countries that do not provide adequate levels of data protection is prohibited.

4.3. Handling of Sensitive Data

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

5. RIGHTS OF DATA SUBJECTS.

Data Subjects whose Personal Data is registered in the Databases of PLANTAS Y BULBOS S.A.S. have the following rights under Law 1581 of 2012:

- a) To know, update, correct and/or delete their personal data from the Controllers or Processors.
- b) To request proof of the Authorization granted to PLANTAS Y BULBOS S.A.S., except when expressly exempt per Article 10 of Law 1581 of 2012.
- c) To be informed, upon request, of the use that has been made of their Personal Data.
- d) To revoke authorization and/or request data deletion when Processing does not respect constitutional and legal principles, rights and guarantees.
- e) To access, free of charge, their Personal Data that has been subject to Processing.
- f) To file complaints with the Superintendence of Industry and Commerce for violations of the Law and applicable regulations.

5.1. RIGHTS OF CHILDREN AND ADOLESCENTS.

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 that is of a public nature.

6. QUERY AND COMPLAINT PROCEDURE.

QUERY

Data Subjects or their successors may consult personal information held in the databases of PLANTAS Y BULBOS S.A.S. The query shall be made in writing by submitting **form FC-006** (provided by the management assistant) at the company's premises. The query will be addressed within a maximum of **ten (10) business days** from the date of receipt. If it is not possible to address the query within this period, the interested party shall be informed, and the response date shall not exceed **five (5) additional business days**.

COMPLAINTS

The Data Subject or their successors may file a complaint with PLANTAS Y BULBOS S.A.S. when information should be corrected, updated or deleted, or when a presumed breach of legal duties is identified. The complaint shall be handled under the following rules:

- a) The complaint is filed by fully completing **form FC-004** (provided by the management assistant), including the Data Subject's identification, description of the facts, address, and supporting documents. If incomplete, the interested party has **five (5) days** to remedy deficiencies. After **two (2) months** without response, the complaint will be considered withdrawn. If the receiving party is not competent, they shall forward the complaint within **two (2) business days**.
- b) Once received, a note stating "**COMPLAINT IN PROCESS**" and the reason shall be included in the database within **two (2) business days** and maintained until the complaint is resolved.
- c) The maximum period to address the complaint is **fifteen (15) business days** from the day following receipt. If not possible within this period, the Data Subject shall be informed, and the new date shall not exceed **eight (8) additional business days**.

7. IDENTIFICATION OF DATABASES AND VALIDITY PERIOD.

The databases under processing by PLANTAS Y BULBOS S.A.S. are those set forth in the internal manual of policies and procedures on Personal Data Protection, and shall be stored for up to **ten (10) years** from the date of the last processing, to enable compliance with legal and/or contractual obligations in accounting, labor, tax and fiscal matters.

8. TEMPORARY LIMITATIONS ON THE PROCESSING OF PERSONAL DATA.

PLANTAS Y BULBOS S.A.S. and its Processors may only collect, store, use or circulate personal data for the time that is reasonable and necessary in accordance with the purposes that justified the Processing. Once the purposes are fulfilled, PLANTAS Y BULBOS S.A.S. and the Processor shall proceed to delete the personal data in their possession, unless retention is required for compliance with a legal or contractual obligation.

PLANTAS Y BULBOS S.A.S. or its Processors shall document the procedures for the Processing, retention and deletion of personal data in accordance with applicable provisions and the instructions of the Superintendence of Industry and Commerce.

8.1. INFORMATION SECURITY AND SECURITY MEASURES.

PLANTAS Y BULBOS S.A.S. has adopted the technical, human and administrative measures necessary to establish security standards for records, preventing their adulteration, loss, unauthorized or fraudulent access, use or consultation. Information security policies are set forth in the "**Internal manual of policies and procedures on personal data protection.**"

9. VALIDITY AND UPDATING OF THE POLICIES.

As a general rule, authorizations for the use of personal data are understood to be for the duration of the commercial relationship or service enrollment, and may be terminated at the Data Subject's will at any time. If the person is an active client, their data may not be used for anything other than the provision of the contracted product or service.

Any substantial change to the Processing Policies will be communicated in a timely manner to Data Subjects through:

- a) Email sent to the Data Subjects.
- b) For Data Subjects without access to electronic means, communication will be made at the company's premises.

Communications will be sent at least **ten (10) days** before implementing new or substantially updated policies.

This Policy is effective as of the tenth (10th) of March, two thousand and twenty-six (2026).

LUIS MARIANO BOTERO IRIARTE
Legal Representative