

PERSONAL DATA PROCESSING POLICY

MEGA STORAGE COLOMBIA S.A.S

NIT: 900.585.869-8

Version 2.0 – Effective 2026

Updated in accordance with current regulations:
Law 1581 of 2012 | Decree 1074 of 2015 | SIC Circulars 2025

TABLE OF CONTENTS

- Chapter One – General Provisions
- Chapter Two – Processing of Personal Data
- Chapter Three – Rights of Data Subjects
- Chapter Four – Final Provisions

CHAPTER ONE GENERAL PROVISIONS

1. Identification of the Data Controller

For the purposes of this Policy, MEGA STORAGE COLOMBIA S.A.S is identified as follows:

Company Name:	MEGA STORAGE COLOMBIA S.A.S
NIT:	900.585.869-8
Address:	CALLE 8 B N 65-251
Phone:	604 605 15 25
Email:	contabilidad@megastorage.com.co

2. Applicable Legal Framework

This Policy is based on the current regulations on personal data protection in Colombia:

- **Political Constitution of Colombia** – Articles 15 and 20 (right to privacy, good name, and freedom of information).
- **Statutory Law 1266 of 2008** – General provisions on financial, credit, commercial, and service Habeas Data.
- **Statutory Law 1581 of 2012** – General provisions for the protection of personal data. Main applicable standard.
- **Decree 1074 of 2015** – Single Regulatory Decree for the Commerce Sector, which compiled Decree 1377 of 2013, regulating Law 1581 of 2012. Includes the principle of demonstrated accountability (Art.

2.2.2.25.6.1).

- **SIC External Circular 003 of 2018** – Instructions on the National Database Registry (RNBD).
- **SIC External Circular 001 of 2025** (published in O.G. No. 53,248 of September 19, 2025) – Instructions on personal data processing in digital services and the principle of demonstrated accountability.
- **SIC External Circular 002 of 2025** (October 2025) – Instructions on data protection in technology transfer processes.
- **SIC Single Circular, Title V** – Personal Data Protection.
- Other standards, regulations, and provisions of the SIC currently in force.

3. Definitions

For the understanding and interpretation of this Policy, the following definitions are adopted in accordance with Law 1581 of 2012:

Authorization: Prior, express, and informed consent of the Data Subject to carry out the Processing of their personal data.

Privacy Notice: Verbal or written communication generated by the Controller, directed to the Data Subject, informing them of the existence of the Personal Data Processing Policy, how to access it, and the purposes of the processing.

Database: Organized set of personal data subject to Processing.

Biometric Data: Personal data resulting from specific technical processing relating to the physical, physiological, or behavioral characteristics of a person that allows their unique identification (fingerprints, facial recognition, iris, voice, etc.). Classified as sensitive data.

Personal Data: Any information linked to or that can be associated with one or more identified or identifiable natural persons.

Public Data: Data that is not semi-private, private, or sensitive. Public data includes civil status, profession, status as a merchant or public servant.

Semi-Private Data: Data that is not of an intimate, reserved, or public nature, and whose knowledge or disclosure may be of interest not only to its holder but to a certain sector or group of people or to society in general.

Private Data: Data that, due to its intimate or reserved nature, is only relevant to the data subject.

Sensitive Data: Data that affects the privacy of the Data Subject or whose improper use may generate discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, trade union membership, health data, sexual life, biometric data, and genetic data.

Data Processor: Natural or legal person, public or private, that alone or in association with others, carries out the Processing of personal data on behalf of the Data Controller.

Habeas Data: Fundamental right that enables the data holder to request access, update, rectification, deletion of their personal data, and to revoke the authorization granted for its processing.

Data Controller: Natural or legal person, public or private, that alone or in association with others, decides on the database and/or the Processing of data.

Demonstrated Accountability: Principle by which the Data Controller must be able to demonstrate, upon request by the SIC, that it has implemented appropriate and effective measures to comply with the obligations of Law 1581 of 2012 and Decree 1074 of 2015.

Data Subject: 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, located in Colombia, sends information or personal data to a recipient who is a Data Controller inside or outside the country.

Transmission: Processing of personal data involving its communication within or outside Colombia, when its purpose is Processing by the Processor on behalf of the Controller.

4. Guiding Principles of Processing

The processing of personal data carried out by MEGA STORAGE COLOMBIA S.A.S is governed by the following principles established in Law 1581 of 2012 and Decree 1074 of 2015:

A. LEGALITY: Processing is a regulated activity that must comply with Law 1581 of 2012 and other applicable regulations.

B. PURPOSE: Processing must respond to a legitimate purpose, which must be communicated to the data subject.

C. FREEDOM: Processing may only be carried out with the prior, express, and informed consent of the data subject.

D. ACCURACY OR QUALITY: Information subject to processing must be truthful, complete, accurate, current, verifiable, and understandable.

E. TRANSPARENCY: The Controller and Processor guarantee the data subject the right to obtain information about the existence of data concerning them.

F. RESTRICTED ACCESS AND CIRCULATION: Processing is subject to the limits derived from the nature of personal data, the law, and the Constitution.

G. SECURITY: Information must be handled with the necessary technical, human, and administrative measures to prevent its alteration, loss, unauthorized consultation, use, or access.

H. CONFIDENTIALITY: All persons involved in processing are obligated to maintain the confidentiality of information, even after their relationship with the company ends.

I. NECESSITY OR MINIMIZATION: Only data strictly necessary for the fulfillment of the intended purpose may be processed.

J. DEMONSTRATED ACCOUNTABILITY: The Controller must implement appropriate and effective measures to comply with legal obligations and be able to demonstrate this to the SIC.

5. Purpose and Scope of the Policy

The Personal Data Processing Policy aims to establish the criteria under which MEGA STORAGE COLOMBIA S.A.S processes the personal information stored in its databases, physical and digital files, the requirements for inquiries and complaints, the purposes, security measures, and other aspects related to the protection of personal information, in compliance with Statutory Law 1581 of 2012 and Decree 1074 of 2015.

6. Data Subjects Covered by the Policy

This Policy applies to:

- A. Current and former employees
- B. Clients
- C. Suppliers and contractors

D. Job applicants

E. Any natural person who has or has had a commercial, contractual, or employment relationship with MEGA STORAGE COLOMBIA S.A.S

CHAPTER TWO PROCESSING OF PERSONAL DATA

7. Types of Personal Databases

MEGA STORAGE COLOMBIA S.A.S maintains the following types of databases:

- A. CLIENT DATABASES:** Data of natural and legal persons who have or have had a commercial relationship with MEGA STORAGE COLOMBIA S.A.S.
- B. EMPLOYEE DATABASES:** Data related to payroll management, occupational health and safety, and personnel administration.
- C. SUPPLIER DATABASES:** Data relating to the management of suppliers and contractors.

8. Types of Personal Data Collected by MEGA STORAGE COLOMBIA S.A.S

The data collected by MEGA STORAGE COLOMBIA S.A.S falls into the following categories:

CATEGORY	DATA INCLUDED
IDENTIFICATION DATA	General: names, surnames, ID type and number, issuance date and place, civil status, gender. Specific: signature, nationality, family data, electronic signature, place and date of birth, age.
LOCATION DATA	Business-related: address, phone, email. Personal: home address, phone, email.
SENSITIVE DATA	Health data, biometric data (fingerprints, facial recognition, voice), images, medical studies, and other data.
SOCIOECONOMIC DATA	Tax information, asset data (property, income, expenses, investments), economic activity, employment history.
OTHER DATA	Criminal and/or disciplinary records. System access data (usernames, IP, profiles). Video surveillance data.

9. Processing Operations Applied to Personal Data

9.1. Collection

The processing of personal information carried out by MEGA STORAGE COLOMBIA S.A.S is obtained through various activities related to its corporate purpose and employer obligations. Information is obtained directly from the data subject, who is duly informed of the purpose of the processing and grants their prior, express, and informed authorization.

The instruments used for information collection are:

DATABASE	PERSONAL INFORMATION COLLECTION METHOD
HUMAN RESOURCES	Resume Direct interview with the employee Public documents
CLIENTS	Articles of incorporation Tax registration (RUT) Enrollment Form

DATABASE	PERSONAL INFORMATION COLLECTION METHOD
SUPPLIERS	Tax registration (RUT) Chamber of Commerce certificate Purchase invoice

9.2. Storage and Security Measures

Personal information is stored on proprietary and/or contracted servers with all required physical, technical, and administrative security measures. MEGA STORAGE COLOMBIA S.A.S implements the following measures:

- **Technological measures:** information encryption, access controls, authentication, periodic data backup, antivirus, and firewalls.
- **Administrative measures:** internal policies, staff training, confidentiality agreements, segregation of duties.
- **Physical measures:** access control to facilities, equipment protection, secure archiving of physical documents.
- **Periodic review:** security measures are periodically evaluated and documented in compliance with the principle of demonstrated accountability.

9.3. Purposes of Processing

The use and purpose of information collected and stored in the databases has the following objectives:

1. Send information related to programs, activities, news, products, and services offered by MEGA STORAGE COLOMBIA S.A.S.
2. Carry out the corporate purpose of MEGA STORAGE COLOMBIA S.A.S in accordance with its bylaws.
3. Comply with current regulations in Colombia.
4. Comply with the rules applicable to suppliers and contractors, including tax and commercial regulations.
5. Comply with Colombian labor and social security law.
6. Conduct surveys related to the company's services or products.
7. Fulfill all contractual commitments.
8. Manage the accounts receivable collection process and fulfillment of obligations.
9. Prevent fraud and verify the identity of persons with whom the company interacts.
10. Fulfill legal, regulatory, or contractual obligations.

IMPORTANT NOTE: For purposes of sending advertising, marketing, or promotional activities (ancillary purposes), a specific and differentiated authorization will be requested, allowing the data subject to object to such purposes without affecting the primary relationship.

9.4. Circulation

MEGA STORAGE COLOMBIA S.A.S does not share the personal data it collects with third parties, except in the following cases:

- When the data subject provides express authorization.
- When circulation is necessary to fulfill legal obligations.
- When required by a competent judicial or administrative authority.
- When involving Data Processors providing services to MEGA STORAGE COLOMBIA S.A.S, in which case the corresponding data transmission agreements will be executed.

9.5. International Data Transfers

In the event that MEGA STORAGE COLOMBIA S.A.S carries out international transfers of personal data, these will be made only to countries that have adequate levels of data protection pursuant to Article 26 of Law 1581 of 2012 and the SIC Single Circular. In cases where the recipient country does not offer an adequate level of protection, legal exceptions will be applied or a declaration of compliance will be requested before the SIC's Data Protection Delegate.

9.6. Data Retention and Deletion

Personal data will be retained for the time necessary to fulfill the purposes that justified its collection, and in any case, for the period required by law. Once the processing purpose is fulfilled or the legal retention periods have expired, MEGA STORAGE COLOMBIA S.A.S will proceed to the secure deletion of the data.

The data subject has the right to request deletion in any of the following circumstances:

1. When they consider that their data is not being processed in accordance with the principles, duties, and obligations set forth in current regulations.
2. When the data is no longer necessary or relevant for the purpose for which it was collected.
3. When the period necessary for the fulfillment of the purposes for which it was collected has elapsed.

However, the right to deletion is not absolute. MEGA STORAGE COLOMBIA S.A.S may deny its exercise when:

- a. The data subject has a legal or contractual duty to remain in the database.
- b. Deletion of data would obstruct judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes, or the enforcement of administrative sanctions.
- c. The data is necessary to protect the legally recognized interests of the data subject, to carry out an action in the public interest, or to fulfill a legally acquired obligation.

10. Authorization for Personal Data Processing

MEGA STORAGE COLOMBIA S.A.S requests free, prior, express, and informed authorization from data subjects and has established appropriate mechanisms to verify, in each case, that such authorization has been granted.

Authorization may be given in physical or electronic documents, data messages, web pages, or any other format that allows consent to be obtained through unambiguous conduct.

For sensitive data, authorization must be explicit and inform the data subject of its optional nature.

For the processing of data of minors, authorization will be required from their legal representatives (parents or guardians), ensuring the best interests of the child.

11. Privacy Notice

MEGA STORAGE COLOMBIA S.A.S will inform data subjects, through the corresponding Privacy Notice, of the existence of this Policy, how to access it, and the purposes of the processing. The Privacy Notice will be available through the company's communication channels.

12. National Database Registry (RNBD)

MEGA STORAGE COLOMBIA S.A.S will comply with the obligation to register and keep updated the National Database Registry before the SIC, in accordance with Law 1581 of 2012, Decree 1074 of 2015, and SIC External Circular 003 of 2018, under the terms and conditions required by current regulations.

13. Demonstrated Accountability

In compliance with the principle of demonstrated accountability established in Article 2.2.2.25.6.1 of Decree 1074 of 2015, MEGA STORAGE COLOMBIA S.A.S implements appropriate and effective measures to ensure compliance with personal data protection regulations, including:

- Documentation of personal data processing activities.
- Periodic and documented reviews of implemented security measures.
- Continuous training for personnel with access to personal data.
- Implementation of privacy by design and by default measures.
- Execution of data transmission agreements with data processors.

14. Security Incidents

In the event of a security incident that compromises the confidentiality, integrity, or availability of personal data, MEGA STORAGE COLOMBIA S.A.S will take immediate corrective action and notify affected data subjects when the incident may generate a significant risk to their rights. It will also document the incident and the corrective actions taken, in compliance with SIC instructions.

CHAPTER THREE RIGHTS OF PERSONAL DATA SUBJECTS

15. Rights of the Data Subject

The fundamental right of Habeas Data entitles the data subject to request access, update, rectification, and deletion of their personal data, as well as to revoke the authorization granted for its processing. The data subject is entitled to:

- A. KNOW:** Know the personal data stored in MEGA STORAGE COLOMBIA S.A.S's databases.
- B. UPDATE:** Update their personal data if found to be partial, incomplete, or fragmented.
- C. RECTIFY:** Rectify their personal data if found to be incorrect, partial, or misleading.
- D. DELETE:** Request deletion of their personal data from the databases, subject to legal exceptions.
- E. REVOKE:** Revoke authorization for the processing of their personal data, provided it does not result in non-compliance with legal obligations.
- F. COMPLAINT BEFORE SIC:** File complaints before the Superintendence of Industry and Commerce (SIC) for violations of Law 1581 of 2012.
- G. FREE OF CHARGE:** Exercise of data subject rights is free of charge. Shipping costs may only be charged upon express request by the data subject.

16. Procedure for Exercising Rights

16.1. Inquiry

Through the inquiry mechanism, the data subject may request MEGA STORAGE COLOMBIA S.A.S access to their personal information stored in the databases.

The inquiry will be addressed within a maximum of ten (10) business days from the date of receipt. If it is not possible to respond within this period, the data subject will be informed of the reasons for the delay and a response will be provided within the following five (5) business days after the expiration of the first period.

16.2. Complaint

Through the complaint mechanism, the data subject may submit a complaint to MEGA STORAGE COLOMBIA S.A.S regarding any dissatisfaction with the use of their data.

The complaint will be addressed within a maximum of fifteen (15) business days from the day following its receipt. If it is not possible to address the complaint within this period, the data subject will be informed of the reasons for the delay and a response will be provided within the following eight (8) business days.

If the complaint is incomplete, the data subject will be notified within five (5) days of receipt to correct the deficiencies. If the required information is not submitted within two (2) months of the request, the complaint will be considered withdrawn.

If MEGA STORAGE COLOMBIA S.A.S is not competent to resolve the complaint, it will be forwarded to the appropriate party within a maximum of two (2) business days, and the data subject will be informed.

17. Persons Authorized to Exercise Rights

The following are authorized to submit inquiries or complaints:

- a. Employees, former employees, contractors, suppliers, and collaborators who have had a relationship with MEGA STORAGE COLOMBIA S.A.S.
- b. Clients and visitors.
- c. The heirs of the data subject.
- d. The representative and/or attorney of the data subject.
- e. Third parties authorized by the data subject or by law.
- f. In general, any data subject whose personal information is stored in MEGA STORAGE COLOMBIA S.A.S's databases.

18. Information to be Provided by the Data Subject

For inquiries and complaints, the data subject must provide:

- a. Full names and surnames.
- b. ID type and number.
- c. Home address.
- d. Contact phone number.
- e. Email address.
- f. The information necessary to process the request and supporting documents.

If the data subject is a minor, the request must be submitted through the responsible adult or legal representative, without the minor's rights being denied.

19. Channels Available for Exercising Habeas Data Rights

Email:	Servicioalcliente2@ustorage.co
Physical Address:	Calle 8 B N 65-251
Office Hours:	08:00 AM – 05:00 PM, Monday to Friday

20. Area Responsible for Policy Compliance

The Administrative Area of MEGA STORAGE COLOMBIA S.A.S is responsible for the effective compliance with this Policy, as well as for inquiries and complaints related to personal data protection. Any other area of MEGA STORAGE COLOMBIA S.A.S may also be required to verify compliance with personal data protection regulations.

CHAPTER FOUR FINAL PROVISIONS

21. Permanent Measures

In the processing of personal data, MEGA STORAGE COLOMBIA S.A.S will permanently verify in its processes, protocols, procedures, and policies that the Habeas Data right of data subjects is guaranteed and that authorization for data processing is obtained in compliance with legal requirements.

22. Binding Nature of the Policy

Any data subject who has any relationship with MEGA STORAGE COLOMBIA S.A.S must comply with this policy. This policy is also mandatory for all employees, contractors, and collaborators of MEGA STORAGE COLOMBIA S.A.S who have access to personal data.

23. Internal Policies and Procedures Manual

This policy is articulated with the Internal Manual of Policies and Procedures for Personal Data Processing, which establishes the internal criteria, requirements, and procedures for implementing this policy and complying with the principle of demonstrated accountability.

24. Modifications and Updates

MEGA STORAGE COLOMBIA S.A.S reserves the right to modify this Policy at any time. Any material change will be communicated to data subjects through available communication channels, prior to its entry into force, in accordance with Articles 15 and 17 of Law 1581 of 2012. The updated version of the Policy will be available through the company's service channels.

25. Sanctions

Non-compliance with this Policy and personal data protection regulations may result in the sanctions provided in Article 23 of Law 1581 of 2012, including fines of up to two thousand (2,000) current monthly minimum wages, suspension of activities, and temporary or permanent closure of operations.

26. Approval Date and Effective Date

This updated version of the Personal Data Processing Policy was approved and takes effect on January 1, 2026, fully replacing the previous version in force since 2015.

Alejandra Galeano
Legal Representative

MEGA STORAGE COLOMBIA S.A.S