



PERSONAL DATA PROTECTION POLICY

In compliance with the current legal regulations on personal data protection, especially the provisions set forth in Statutory Law 1581 of 2012 and its Regulatory Decree 1377 of 2013, Capilo Innovación hereby informs and makes known its policies for the processing of personal data, with the purpose of protecting the information provided (the "Policy"), establishing procedures to guarantee the use of such data under the applicable legal parameters.

In accordance with this Policy, the personal information and data provided to Capilo Innovación may be processed, collected, archived, used, managed, deleted, shared, and otherwise treated in accordance with legal terms and the applicable Policy, for the purpose of carrying out the development and execution of its functions.

IDENTIFICATION

Capilo Innovación ("Capilo"), identified with Tax ID (NIT) No. 901.463.130-4, is an institution specialized in hair treatments, offering services such as hair medical consultation, high-frequency therapy, laser cap therapy, and microneedling therapy, under the purpose of "science, excellence, and hair transformation."

Entity address:

El Tesoro Shopping Center, Medical Tower 2, Office 1663
CRA 25A # 1A Sur 45

DEFINITIONS

- **Restricted access:** Level of access to information limited to previously defined parameters.
- **Authorization:** Prior, express, and informed consent of the data subject to carry out the processing of personal data that has been provided or collected in the data bank in records of public and private entities or granted by their holder.
- **Privacy notice:** verbal or written communication generated by the person responsible directed to the data subject for the processing of their personal data, by which they are

informed about the existence of the Policy that will be applicable, how to access them and the purposes of the processing intended for the personal data.

- **Database:** An organized set of personal data subject to processing.
- **Successor:** Person who succeeds another due to death (heir).
- **Personal data:** any piece of information linked to one or more people determined or determinable or that can be associated with a natural or legal person.
- **Public data:** is data that is not semiprivate, private, or sensitive. Public data include, among others, information relating to the civil status of people, their profession or trade, and their status as a merchant or public servant. By their nature, public data may be contained, among others, in public records, public documents, gazettes and official bulletins, and judicial sentences duly final and not subject to confidentiality.
- **Sensitive data:** sensitive data are those that affect the holder's privacy or whose improper use may result in discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in unions, social organizations, human rights organizations, or that promote interests of any political party or guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.
- **Indispensable data:** are those personal data of the holders essential to carry out the provision of diagnostic imaging services. Indispensable data must be provided by the holders of these or those legitimized to exercise these rights.
- **Optional data:** are those data that Capilo requires to offer services additional in research, teaching, outreach, job offers, etc.
- **Public personal data:** all personal information that is freely available and open to the general public.
- **Private personal data:** all personal information that is known by, restricted, and in principle private for the general public.
- **Semiprivate data:** semiprivate data is not intimate, reserved, or public by nature, and whose knowledge or disclosure may interest not only its holder but also a certain sector or group of people or to so city in general.
- **Electronic document:** is the information generated, sent, received, stored, or communicated through electronic means.
- **Data controller:** a natural or legal person, public or private, who by itself or in association with others carries out the Processing of personal data on behalf of the data controller.
- **Habeas data:** right of any person to know, update and correct the information that has been collected about them in the database and in the records of public and private entities.

- **Information:** set organized data set generated, obtained, acquired, transformed or controlled that constitute a message regardless of the medium it contains (digital and non-digital).
- **Technological infrastructure:** all information technology elements that support the operation of the institution, including hardware platforms, communications, and the software system for communications and database management, among others.
- **Data protection law:** it is Law 1581 of 2012 and its regulatory Decrees or the rules that modify, complement or replace them.
- **Data message:** information generated, sent, received, stored or communicated by electronic, optical, or similar means such as electronic data interchange, Internet, email, telefax, etc.
- **Asynchronous communication method:** texts, images and data transmitted without the need for the sender or receiver to be physically present.
- **Technological Resources:** are a means, good or instrument that utilizes the technology to fulfill a purpose.
- **Data controller:** natural or legal person, public or private, who by themselves or in association with others decides on the basis of data and/or Processing of the data.
- **Data subject:** natural person whose personal data are the subject of Processing.
- **Processing:** any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- **Transfer:** data transfer occurs when the controller and/or person in charge of data processing, located in Colombia, sends the information or personal data to a recipient who is also responsible for the processing and is located inside or outside the country.
- **Transmission:** processing of personal data that involves communication of these within or outside the territory of the Republic of Colombia when it has as its object the execution of processing by the processor on behalf of the controller.
- **Information and Communication Technologies (“ICT”):** are the set of resources, tools, equipment, computer programs, applications, networks and means that allow the compilation, processing, storage, transmission of information such as voice, data, text, video and images.

PRINCIPLES

In the development, interpretation and application of Law 1581 of 2012, which establishes general provisions for the protection of personal data and the regulations that complement, modify or add to it, the following guiding principles shall be applied harmoniously and comprehensively:

- a. **Principle of legality:** data processing is a regulated activity that must comply with what is established in the law and the other provisions that implement it.
- b. **Principle of purpose:** processing must comply with a legitimate purpose in accordance with the Constitution and the Law, which must be disclosed to the data subject. With regard to the collection of personal data, Capilo will limit itself to those data that are pertinent and adequate for the purpose for which collected or required. The user may be contacted and receive information about the benefits offered by the Company. Sensitive data affecting privacy will only be used for service provision and the user is not obliged to provide them.
- c. **Principle of freedom:** processing may only be performed with the free, prior, express and informed consent of the data subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that waives consent.
- d. **Principle of truthfulness or quality:** information subject to processing must be true, complete, accurate, up-to-date, verifiable and understandable. Partial, incomplete, segmented data or data that misleads are prohibited. Authenticity is understood as the attribute generated in a data message, when there is certainty about the person who prepared, issued, signed it or when there is certainty regarding the person to whom the data message is attributed.
- e. **Principle of transparency:** in progressing, the right of the data subject to obtain from de data controller of the data processor must be guaranteed, at any time and without information about the existence of data that restrictions, concerning them.
- f. **Principle of restricted access and circulation:** processing is subject to the limits derived from the nature of personal data, the provisions of the law, and the Constitution. In this sense, processing may only be carried out by persons authorized by the data subject and/or by those provided for by law. Personal data, except for public information, may not be available on the internet or other mass communication or disclosure media, unless access is technically controllable to provide restricted knowledge only to the data subjects or authorized third parties in accordance with the law.
- g. **Principle of security:** information processed by Capilo must be handled with the technical, human, and administrative measures necessary to provide security to the records, preventing their alteration, loss, consultation, use or unauthorized or fraudulent access.
- h. **Principle of confidentiality and privacy:** it is the property of preventing access or the disclosure of information to unauthorized persons or systems.
- i. **Principle of integrity:** it is the condition that guarantees that the information contained in a data message has remained complete and unaltered, except for the authorized addition of an endorsement or a change inherent to the process of communication, filing, or presentation.

RIGHTS ASSISTING THE DATA SUBJECT

The data subject shall have the following rights:

- a.** To know, update, and rectify their personal data before Capilo in its capacity as data controller. This right may be exercised, among others, with respect to partial, inaccurate, incomplete, fragmented data, data that leads to error, or data whose processing is expressly prohibited or has not been authorized.
- b.** Request proof of the authorization granted to Capilo, except when expressly exempted as a requirement for Processing (cases in which authorization is not necessary).
- c.** To be informed by Capilo, upon request, about the use that has been made of their personal data.
- d.** File complaints with the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and other regulations that modify, add to, or supplement it.
- e.** Revoke the authorization and/or request the deletion of the data when the Processing does not respect constitutional and legal principles, rights, and guarantees.
- f.** Access their personal data that has been processed free of charge, following the procedures and protocols previously established by the institution.
- g.** Refrain from filling out any instrument for collecting personal data that does not comply with the legal framework on personal data.

RIGHTS OF CHILDREN AND ADOLESCENTS

Processing of personal data of children and adolescents under 18 is prohibited, except for data of a public nature under Law 1581 of 2012, which may be subject to processing provided that the purpose of such processing serves their best interests and ensures, without exception, respect for their prevailing rights within the framework of Law 1098 of 2006, or any law that amends, repeals, or supersedes it ensuring respect.

It is the task of the State and educational entities of all kinds to provide information and train legal representatives and guardians about the potential risks faced by children and adolescents regarding the improper processing of their personal data, and to provide knowledge about the responsible and safe use by children and adolescents of their personal data, their right to privacy and protection of their personal information and that of others.

DUTIES OF CAPILO

Pursuant to this policy on the processing and protection of personal data, the following are the duties of CAPILO the following, without prejudice to the provisions outlined in the Law.

- a.** Guarantee to the holder, at all times, the full and effective exercise of the right to habeas data.
- b.** Request and retain a copy of the respective authorization granted by the holder.
- c.** Adequately inform the holder about the purpose of the collection and the rights that assist them by virtue of the authorization granted.
- d.** Store the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access.
- e.** Ensure that the information is truthful, complete, accurate, up-to-date, verifiable and understandable.
- f.** Update the information, thereby addressing all updates regarding the holder's data. Additionally, all necessary measures must be implemented to keep the information up-to-date.
- g.** Rectify information when it is incorrect and communicate what is pertinent.
- h.** Respect the security and privacy conditions of the holder's information.
- i.** Process inquiries and claims filed in the terms set by law.
- j.** Identify when specific information is under dispute by the holder.
- k.** Inform the data subject of the use given to their data.
- l.** Inform the data protection authority when breaches of security codes occur and there are risks in the management of data subjects' information.
- m.** Comply with the requirements and instructions issued by the Superintendency of Industry and Commerce on the subject in particular.
- n.** Use only data whose processing is previously authorized in accordance with Law 1581 of 2012.
- o.** Keep personal data of the data subjects confidential whenever they are semi-private, private, or sensitive, as well as data of children and adolescents of any type.

- p. Capilo will use the data subject's personal data only for those purposes for which it is duly empowered and, in all cases, respecting the regulations in force regarding personal data protection.
- q. In the collection, processing, and circulation of data, freedom and other guarantees enshrined in the Constitution will be respected.

THE NATIONAL REGISTER OF DATABASES

The National Register of Databases (“RNBD”) is the public directory of databases subject to Processing that operate in the country and will be administered by the Superintendency of Industry and Commerce and will be freely accessible to citizens.

Once the National Government regulations the minimum information that the Registry must contain, and the terms and conditions under which they must be registered in it, Capilo will provide to the Superintendence of Industry and Commerce the data bases subject to processing within the specified time and in accordance with the directives issued by the governmental authority.

AUTHORIZATIONS AND CONSENT OF THE DATA SUBJECT

Without prejudice to the exceptions provided in the Law, in the processing of the data subject's personal data, prior informed authorization is required from them, which must be obtained by any means that may be subject to later consultation, ensuring the application of Article 15 of the Political Constitution of Colombia.

ACCESS TO IMAGES BY DATA SUBJECT PERSONAL

Data subjects are empowered to exercise their right of access to images processed through surveillance systems (“SV”). When the data subject exercises this right, Capilo, as the Data Controller, will implement the procedures and the necessary measures to protect the rights of the other Data Subjects whose personal data have been processed together with those of the person requesting access. In that sense, a procedure will be followed to access the images that allows the Controllers and Processors of the Processing to verify the status of the Data Subject who requests access to the information.

METHOD AND MANIFESTATION TO GRANT THE DATA SUBJECTS AUTHORIZATION

Capilo, in terms provided by the Law, issued a notice in which data subjects are informed that they may exercise their right to the processing of personal data through the page <https://capilo.com.co/> and the email servicioalcliente@capilo.com.co, the only means available for the Data Subject to exercise said right.

The company is not legally responsible for the handling of personal data provided by the data subjects through means other than those referenced or by persons outside Capilo, which may be used for fraudulent purposes as stipulated by Law 1928 of 2018.

EVENTS IN WHICH THE DATA SUBJECT'S AUTHORIZATION IS NOT NEEDED OF PERSONAL DATA

The authorization of the data subject will not be necessary in the following cases:

- a.** Information required by a public or administrative entity in the exercise of its legal functions or by court order
- b.** Public nature data.
- c.** Cases of medical or health emergencies
- d.** Processing of information permitted by law for historical, statistical or scientific purposes.
- e.** Data related to people's Civil Registry.

LEGITIMATION TO EXERCISE THE DATA SUBJECT RIGHT

The rights of data subjects established by the Law may be exercised by the following people:

- a.** By the data subject, who must prove their identity in person, or by digital means such as the digital ID or biometrics in a sufficient form and by the various means that Capilo makes available to them.
- b.** By the rightful heirs of the data subject, who must prove such status.
- c.** By the representative and/or attorney-in-fact of the data subject, upon prior accreditation of representation or empowerment.
- d.** By stipulation in favor of another or for another.
- e.** The rights of children and adolescents will be exercised by persons authorized to represent them.

PROCESSING TO WHICH THE DATA WILL BE SUBJECT AND PURPOSE

The processing of the indispensable personal data of patients will be framed within the legal order and by virtue of Capilo's status as a Health Institution, and will be exclusively all the necessary for fulfilling the institutional mission of providing diagnostic imaging services.

For the case of sensitive personal data, use and processing may be made when:

- a.** The Data Subject has given explicit authorization to said Processing, unless in cases where granting said authorization is not required by law.
- b.** The Processing is necessary to safeguard the vital interest of the Data Subject and they are physically or legally unable. In these events, the legal representatives must grant authorization.

- c. The Processing is carried out in the course of legitimate activities and with the proper guarantees by a foundation, NGO, association, or any other non-profit organization, whose purpose is political, philosophical, religious, or trade union, provided that they refer exclusively to its members or to people who maintain contacts regularly by reason of its purpose. In these events, supplying to third the data may not be allowed parties without the Data Subject's authorization.
- d. The Processing refers to data that are necessary for the recognition, exercise, or defense of a right in a judicial proceeding
- e. The Processing has a historical, statistical, or scientific purpose. In this event, measures must be adopted to suppress the identity of the Data Subjects.

The processing of personal data of children and adolescents is prohibited, except when dealing with data of a public nature, and when such processing complies with the following parameters and/or requirements:

- a. That they respond to and respect the best interests of children and adolescents.
- b. That their fundamental rights are ensured.

Having met the above requirements, the representative legal guardian of the children, girls or adolescents will grant the authorization, after the minor's exercise of his/her right to be heard, an opinion that will be valued taking into account maturity, autonomy, and ability to understand the matter.

Capilo will ensure the proper use of the processing of personal data of children or adolescents.

PERSONS TO WHOM THE INFORMATION MAY BE PROVIDED

Information that meets the conditions established by law may be supplied to the following persons:

- a. To the holders, their heirs (when they pass away) or their legal representatives.
- b. To public or administrative entities in the exercise of their legal functions or by judicial order.
- c. To third parties authorized by the holder or by law.

PERSON OR AREA RESPONSIBLE FOR THE HANDLING OF REQUESTS, QUERIES AND COMPLAINTS

Capilo has designated as the area responsible for ensuring compliance with this policy within the institution under the Maintenance Management process, as responsible for Information Security.

This department will be attentive to resolving requests, inquiries and complaints from data subjects and to carrying out any updates, rectifications and deletions of data

personal data, through the email address: servicioalcliente@capilo.com.co

VIDEO SURVEILLANCE SYSTEMS IN OPERATIONAL AREAS

Capilo Innovation may install and use video surveillance (SV) through cameras, video cameras, closed-circuit television (CCTV) in areas such as reception and other operational zones, with purposes of loyalty, scientific, medical, statistical, disease prevention and health promotion, as well as to ensure a better service delivery and user safety. Likewise, SV may be installed and used in the procedure room where hair implants are performed, in order to maintain patient safety, control and monitoring of the procedure from the outset to end.

However, the use of SV in the procedure room will only aim at operations such as real-time image and video recording, so no storage, collection, retention and/or playback will be performed at a later time. The above, subject to the reasons of necessity and relevance of the processing of the images with the specific purpose of guaranteeing patient safety in the procedure room.

In these areas of Video Surveillance, a legible informational notice will be installed, in a visible place and of in a legible, through the which the pre-notice of the installation and existence of SV, its purposes and Capilo's contact channels.

PROCEDURE FOR HANDLING QUERIES, COMPLAINTS AND REQUESTS

a. Queries:

Data subjects or their successors may consult the personal information of the data subject kept in the Capilo institution. All information contained in the individual record or linked to the data subject's identification will be provided.

The query can be made via the email servicioalcliente@capilo.com.co.

The query will be answered within a maximum term of ten (10) business days counted from the date of receipt of this. When it is not possible to attend to the query within that term, the interested party will be informed, stating the reasons for the delay and indicating the date on which your inquiry will be addressed, which in no case may exceed five (5) business days following the expiration of the first term.

b. Complaints:

The data subject or their beneficiaries who consider that the information contained in a database should be corrected, updated, or deleted, or when they notice the alleged breach of any of the duties contained in the law, may file a complaint with Capilo, which will be processed under the following rules:

1. The Owner's claim shall be made by sending a request to Capilo by email to servicioalcliente@capilo.com.co, including the Owner's identification, a description

of the events giving rise to the claim, the address, and accompanying any documents to be submitted. Capilo by email servicioalcliente@capilo.com.co with the identification of the data subject, the description of the facts giving rise to the claim, the address, and attaching the documents that are intended to be used. If the complaint is incomplete, the interested party will be required within five (5) days of receipt of the complaint to correct the deficiencies. If two (2) months elapsed from the date of the request without the applicant providing the required information, it will be understood that they have withdrawn the complaint.

If the person who receives the complaint is not competent to resolve it, he/she will forward it to the appropriate party within a maximum of two (2) business days and will inform the interested party of the situation.

2. Once the email is received at servicioalcliente@capilo.com.co with the complaint complete, it will be tagged with the label "claim in process" and the reason for this within no more than two (2) business days. This label will be kept until the claim is decided.
3. The maximum period to attend to the complaint will be fifteen (15) business days counted from the day following receipt. When it is not possible to address the complaint within that period, the interested party will be informed of the reasons for the delay and the date on which the complaint will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

c. Request for updating, rectification, and deletion of data.

Capilo will rectify and update, at the data subject's request, the information that is incomplete or inaccurate, in accordance with the procedure and terms described above and that have been collected by the company or extracted from databases and in files of public and private entities, for which the data subject will send the request to the email servicioalcliente@capilo.com indicating the update, rectification and deletion of the data and will provide the supporting documentation.

d. Revocation of authorization and/or deletion of the data

Data subjects may revoke consent to the processing of their personal data at any time, provided that a legal or contractual provision does not prevent it; for this, Capilo will make available to the data subject the email: servicioalcliente@capilo.com.co

If the respective legal term has expired, CAPILO, as the case may be, had not deleted the personal data, the Holder shall have the right to request the Superintendence of Industry and Commerce to order the revocation of the authorization and/or the deletion of the personal data. For these purposes, the procedure described in article 22 of the Law 1581 of 2012.

TRANSFER AND NATIONAL AND INTERNATIONAL DATA TRANSMISSION PERSONAL

Capilo, in fulfillment of the institutional mission of providing diagnostic imaging services and considering its permanent or occasional academic and administrative ties with national and international institutions, may carry out transfer and transmission of personal data of the data subjects.

For the national and international transfers of personal data of the data subjects, Capilo will take the necessary measures so that third parties know and commit to observing this Policy, with the understanding that the personal information they receive may only be used for matters directly related to Capilo and only while it lasts, and may not be used or intended for a different purpose or end. For the international transfer of personal data the provisions outlined in Article 26 of Law 1581 of 2012.

The national and international transmissions of personal data carried out by CAPILO will not require informing the Holder or obtaining their consent when there is a contract for the transmission of personal data in accordance with Article 25 of Decree 1377 of 2013.

By accepting this policy, the Holder expressly authorizes the transfer and transmission of personal information. The information will be transferred and transmitted for all relationships that may be established with Capilo.

This personal data protection treatment policy has been drafted based on the original document issued by Capilo and which is located updated as of January 31, 2026 in accordance with current legislation, being communicated to the company's internal staff, and informed and socialized to external personnel, users, suppliers, companies and entities that have contact through the entity's different platforms and information technology means available.

DISCLOSURE OF INFORMATION

Access to and disclosure of the images is restricted and their Processing may only be carried out by persons authorized by the Holder and/or at the request of a public authority in the exercise of its functions. The disclosure of the information collected through an SV is highly controlled and consistent with the purpose established by Capilo, the Data Controller.

CONFIDENTIALITY CLAUSE

Capilo employees, especially those involved in the Processing of personal data, undertake to uphold the principle of confidentiality to the fullest extent and the reservation of the information provided by the Data Subjects, including after the end of their relationship with any of the duties involved in the processing.

CONFIDENTIALITY CLAUSE

This Policy is governed by the laws of the Republic of Colombia and by the provisions of Law 1581 of 2012, its regulatory decree and other rules that modify, repeal, or substitute it, as well as by the following regulations:

Political Constitution, Article 15. Law 1074 of 2015 Partial
Regulatory Decree 1377 of 2013 Law 2055 of 2020 Law
1978 of 2019 Resolution 2238 of 2024

EFFECTIVE DATE

Databases will have a validity period equal to the period during which the purpose or purposes of processing are maintained in each database, or the validity period indicated by a legal, contractual, or jurisprudential cause in a specific manner.