

PRIVACY NOTICE

CLÍNICA DE OTORRINOLARINGOLOGÍA DE ANTIOQUIA S.A.S – ORLANT, located in the city of Medellín at 34th Street No. 63a-30 Barrio Conquistadores, phone number (604) 2658584, website www.clinicaorlant.com, in accordance with Law 1581 of 2012 and its regulatory decrees, as the responsible party in charge of the processing and safeguarding of personal information, hereby informs that:

During the years of our institutional activity, CLÍNICA has collected, recorded, stored, and used information from its users such as full names, identification number, date of birth, address, phone number, email address, among others, for the following purposes:

- a. **Informational**: To inform about changes in schedules for our services.
- b. **Scientific**: To provide information about national and international scientific discoveries or advances related to the services offered by CLÍNICA.
- c. **Advertising**: To promote new services and/or medical procedures offered by CLÍNICA.
- d. **Educational**: To guide our patients and companions in health prevention and promotion activities.
- e. **Commercial**: To comply with obligations derived from existing contractual relationships with interest groups.
- f. **Training**: To inform about academic events and publications.
- g. **Research**: To inform and participate in research processes carried out by CLÍNICA.

CLÍNICA wishes to continue collecting the information obtained as part of the development of its corporate purpose and to process it solely for the purposes mentioned above. For this reason, authorization is required from the owners of the information stored in our databases.

Therefore, if you wish to know, update, correct, or request the deletion of your personal information from the databases of Clínica de Otorrinolaringología de Antioquia S.A.S – **ORLANT**, please contact us within 30 days following the publication of this notice through the contact phones listed at the beginning of this notice or by email at protecciondedatos@clinicaorlant.com. If no action is taken within the stated period, we will consider that you have authorized the processing of your personal data. This is without prejudice to the right you have at any time to access, know, update, correct, or delete your personal information.

your personal data or to request its correction. Likewise, to revoke your consent and exercise your right to the deletion of personal data as established in Law 1581 of 2012.

To ensure transparency in the management of information, **CLÍNICA** has a Policy and a commitment that will guide our institution in the processing of personal information.

See Personal Information Processing Policy at www.clinicaorlant.com

PERSONAL INFORMATION PROCESSING POLICY

“Clínica de Otorrinolaringología de Antioquia S.A.S – ORLANT ensures the proper processing and safeguarding of the information obtained in compliance with its corporate purpose, making available all technological and human resources to guarantee that individuals can enjoy the rights they are entitled to.”

1. Objective

To define the institutional criteria for the management and processing of personal information of users, employees, suppliers, partners, service providers, and the community in general at **CLÍNICA DE OTORRINOLARINGOLOGÍA DE ANTIOQUIA S.A.S – ORLANT**, in accordance with the provisions of Statutory Law 1581 of October 17, 2012, Decree 1377 of 2013, Decree 886 of 2014, and other applicable regulations.

2. Scope

This personal information processing policy applies to the processes of collection, storage, use, circulation, and protection of all databases of **CLÍNICA DE OTORRINOLARINGOLOGÍA DE ANTIOQUIA S.A.S – ORLANT**.

It also applies to the processing of personal information obtained through telephone contact, written or electronic authorization, which will be centralized and managed in the databases of **CLÍNICA DE OTORRINOLARINGOLOGÍA DE ANTIOQUIA S.A.S – ORLANT**, as the data controller.

3. Definitions

For the purposes of this policy, the definitions established in Statutory Law 1581 of 2012 and its regulatory decrees are taken into account.

- a) **Authorization:** Prior, explicit, and informed consent from the Data Subject to carry out the processing of personal data.
- b) **Privacy notice:** Verbal or written communication generated by the Data Controller, addressed to the Data Subject for the processing of their personal data, providing information about who the Data Controller is, the purposes of the processing, and the rights the Data Subject has.

PERSONAL INFORMATION PROCESSING POLICY

Process: Management

Code: DI - PD - 07

Version: 02

Approval date: September 22, 2016

- c) **Database:** An organized set of personal data subject to Processing.
- d) **Personal data:** Any information linked or that may be associated with one or more identified or identifiable natural persons.
- e) **Public data:** Data that is not semi-private, private, or sensitive. Public data includes, among others, information related to a person's civil status, profession or occupation, and their status as a merchant or public servant. By its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly executed judicial rulings that are not subject to confidentiality.
- f) **Sensitive data:** Sensitive data refers to information that affects the privacy of the Data Subject or whose improper use may lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social organizations, human rights organizations, or organizations promoting the 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.
- g) **Data Processor:** A natural or legal person, public or private, who by themselves or in association with others processes personal data on behalf of the Data Controller.
- h) **Habeas Data:** The legal right available to every individual that allows access to an information bank or data record containing informative references about themselves. The data subject has the right to demand the correction of part or all of the data if it causes any type of harm or is inaccurate.
- i) **Data Controller:** A natural or legal person, public or private, who by themselves or in association with others decides on the database and/or the processing of the data.
- j) **Data Subject:** A natural person whose personal data is subject to Processing.
- k) **Transfer:** The transfer of data occurs when the Data Controller and/or Data Processor of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is the Data Controller and is located inside or outside the country.

- l) **Transmission:** Processing of personal data that involves the communication of such data within or outside the territory of the Republic of Colombia when its purpose is to carry out Processing by the Processor on behalf of the Data Controller.
- m) **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.

4. General Information

Name or corporate name: ENT Clinic of Antioquia S.A.S – ORLANT

Address: Medellín

Address: 34th Street No. 63a-30 Barrio Conquistadores

Email: protecciondedatos@clinicaorlant.com

Telephone of the Data Protection Officer: (604) 2658584

5. Processing of Data and Purposes of the Collected Information

The processing of personal information by ENT Clinic of Antioquia S.A.S – ORLANT will be used exclusively for the purposes described in this policy and will be treated with full confidentiality.

The purposes of the information collected by ENT Clinic of Antioquia S.A.S – ORLANT are as follows:

- a) **Informational:** To inform about changes in schedules for our services.
- b) **Scientific:** To provide information about national and international scientific discoveries or advances related to the services offered by the CLINIC.
- c) **Advertising:** To promote new services and/or medical procedures offered by the CLINIC.
- d) **Educational:** To guide our patients and companions in health prevention and promotion activities.
- e) **Commercial:** To comply with obligations derived from existing contractual relationships with interest groups.
- f) **Training:** To inform about academic events and publications.
- g) **Research:** To inform and participate in research processes carried out at the CLINIC.

6. Rights of the Data Subject

The Data Subject has the following rights:

- a) To know, update, and correct their personal data held by ENT Clinic of Antioquia S.A.S – ORLANT, in its capacity as Data Controller and in charge of processing such information.

This right may be exercised, among others, with respect to partial, inaccurate, incomplete, fragmented data, data that may lead to error, or data whose processing is expressly prohibited or has not been authorized either tacitly or in writing for the purposes described in the previous section.

- b) As a general rule, the information provided will be treated as confidential and private, except when authorized or required by law by competent authorities.
- c) The Data Subject may request at any time proof of the authorization granted to the Clinic as Data Controller, except in cases where such authorization is not required.
- d) The Data Subject may at any time file a complaint with the Superintendence of Industry and Commerce for violations of Law 1581 of 2012 and other regulations that modify, supplement, or amend it.
- e) The Data Subject may at any time revoke the authorization and/or request the deletion of information when the processing does not comply with the principles, rights, and constitutional and legal guarantees.
- f) Revocation and/or deletion will be ordered when the Superintendence of Industry and Commerce determines that the processing of information by the Data Controller or Processor has violated this law and/or the Constitution.
- g) The Data Subject, in accordance with the established procedures, may access their personal data authorized for processing free of charge.

These rights may be exercised by:

- a) The Data Subject, who must prove their identity.
- b) The heirs or beneficiaries of the Data Subject, who must prove such status.
- c) The Data Subject's representative or attorney-in-fact, upon proof of their representation or power of attorney.

- d) Another person on behalf of whom the Data Subject has provided authorization.

7. Rights of Children and Adolescents

In the event of processing personal information of minors and adolescents, ENT Clinic of Antioquia S.A.S – ORLANT will ensure respect for the prevailing rights of minors.

In this regard, the processing of personal data of minors is prohibited, except for data of a public nature, and in cases where it is required to process such data, THE CLINIC undertakes to comply with the following parameters:

- a) Respond to and respect the best interests of children and adolescents.
- b) Ensure respect for the fundamental rights of minors.

ENT Clinic of Antioquia S.A.S – ORLANT will ensure the appropriate and responsible use of personal data of minors, as well as their right to privacy and protection of their personal information.

8. Duties Related to the Processing of Personal Information

In accordance with Article 17 of Law 1581 of 2012, ENT Clinic of Antioquia S.A.S – ORLANT undertakes to comply on a permanent basis with the following duties related to the processing of personal data:

- a) Guarantee the Data Subject, at all times, the full and effective exercise of the right to habeas data.
- b) Safeguard the information under the necessary security conditions to prevent its adulteration, loss, unauthorized or fraudulent access, use, or consultation.
- c) Carry out, in a timely manner, that is, within the terms established in Articles 14 and 15 of Law 1581 of 2012, the updating, correction, or deletion of the data.
- d) Process the inquiries and complaints submitted by the Data Subjects within the terms established in Article 14 of Law 1581 of 2012.
- e) Include in the database the legend “information under judicial review” once notified by the competent authority about judicial proceedings related to the quality or details of the personal data.

- f) Refrain from circulating information that is under dispute by the Data Subject and whose blocking has been ordered by the Superintendence of Industry and Commerce.
- g) Allow access to the information only to persons who are authorized to have access to it.
- h) Report to the Superintendence of Industry and Commerce any violations of security codes and any risks in the administration of the personal information of the Data Subjects.
- i) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

9. Data Protection Officer

- a) THE CLINIC has designated a Data Protection Officer, who is the staff member responsible for handling requests, queries, and complaints from any Data Subject seeking to exercise their rights or to receive assistance with the requirements of the Superintendence of Industry and Commerce.

10. Procedure to Exercise Your Right of Access, Inquiry, and Complaints

The Data Subject may exercise their rights by sending a written request to the address 34th Street No. 63a-30, Medellín, or by email to protecciondedatos@clinicaorlant.com.

THE CLINIC will process the request in accordance with the provisions of Articles 14 and 15 of Law 1581 of 2012 and Articles 20 to 23 of Decree 1377 of 2013. The applicant must prove that they are the Data Subject and must always submit the request in writing through the previously described service channels.

11. Authorization

ENT Clinic of Antioquia S.A.S – ORLANT, as the Data Controller of personal data, will request prior and informed authorization from the Data Subject, in all cases when it is possible to subsequently verify the consent for such authorization.

11.1 Mechanism to Grant Authorization

ENT Clinic of Antioquia S.A.S – ORLANT will issue a physical document that will be made available to the Data Subjects prior to the processing of their personal data.

The authorization requested by **ENT Clinic of Antioquia S.A.S – ORLANT** from the Data Subject is a statement informing them of the following:

- a) The identity of the party responsible for collecting the information.
- b) The type of information being requested.
- c) The purposes of the processing.
- d) The mechanisms available to access, inquire, update, correct, or request the deletion of the data.

11.2 Proof of Authorization

ENT Clinic of Antioquia S.A.S – ORLANT will implement the necessary physical and technological measures to maintain a record and provide proof of the authorization obtained from the Data Subjects for the processing of their personal data.

11.3 Revocation of Authorization

Data Subjects may revoke their consent for the processing of their information at any time, provided that such revocation complies with the applicable legal provisions.

To revoke their authorization, the Data Subject must specify whether:

- 1) This is a total revocation of consent: That is, the revocation applies to all the purposes initially consented to. If this is the case, at the request of the Data Subject, the Data Controller will stop processing all of the Data Subject's information.
- 2) This is a partial revocation of consent: That is, if the revocation only applies to certain aspects of their authorization. If this is the case, the Data Controller will continue processing the data for the remaining purposes authorized by the Data Subject, in accordance with the authorization granted.

In light of the above, when submitting a request to revoke consent, the Data Subject must indicate whether the revocation is total or partial. In the latter case, the Data Subject must specify which processing activities are not in accordance with their consent.

12. Validity of this Personal Information Processing Policy

From the date of its publication on the website, any modifications may be notified through the website www.clinicaorlant.com or through the previously established communication channels, so that Data Subjects may be aware of the information.

Referencias

- Constitución Política de Colombia, artículo 15.
- Ley Estatutaria 1581 del 17 de octubre de 2012.
- Decreto Reglamentario 1377 del 27 de junio de 2013.
- Decreto Reglamentario 886 del 13 de mayo de 2014.
- Circular Externa 002 de 2015 – Superintendencia de Industria y Comercio.

Anexos

- Autorización para tratamiento de la información personal.

Elaboró	Revisó	Aprobó
Martha Rivera Asesora Jurídica	Martha Helena Betancur Gomez – Gerente Andrea Arias – Líder de Calidad	Junta Directiva Acta No. 267 de Septiembre 22 de 2016

CONTROL DE CAMBIOS			
Versión	Fecha de Aprobación	Descripción de cambios realizados	Aprobación
01	30 de octubre de 2013	Creación del documento.	Junta Directiva Acta No. 235 de Diciembre 12 de 2013
02	22 de septiembre de 2016	Ajustes del documento de conformidad con lo dispuesto en la Ley Estatutaria 1581 del 17 de octubre de 2012, el Decreto 1377 de 2013, el Decreto 886 de 214 y las demás disposiciones normativas.	Junta Directiva Acta No. 267 de Septiembre 22 de 2016