



## Personal Data Processing Policy in Libe legal

**LIBE LEGAL SOLUTIONS S.A.S** is a commercial company that provides legal services and legal advice to individuals and companies. The purpose of this **Privacy Policy** is to inform the practices and procedures for the processing of **Personal Data** of clients, interested parties, lawyers, employees, candidates for employment and suppliers of **LIBE LEGAL SOLUTIONS S.A.S**, acting in its capacity as responsible for the processing of **Personal Data**.

### 1. Contact information

The following are the contact details of **LIBE LEGAL SOLUTIONS S.A.S.**, for the exercise of rights of the owners:

<b>Company name</b>	<b>LIBE LEGAL SOLUTIONS S.A.S</b>
<b>NIT</b>	901.573.087-7
<b>Address</b>	Bogotá D.C:
<b>Address</b>	Cr 9 Bis No. 97 33 P 601.
<b>Phone</b>	3108077802
<b>E-mail address</b>	admin@libelegal.com
<b>Web site</b>	www.libelegal.com

### 2. Processing of your Personal Data

**LIBE LEGAL SOLUTIONS S.A.S** may collect, store, use, circulate, update, manage, delete, transmit (to third party processors, on behalf of **LIBE LEGAL SOLUTIONS S.A.S**) any information that may be associated with your **Personal Data**, in accordance with the authorization for the processing of **Personal Data**, this **Privacy Policy** and the laws of Colombia.

In compliance with the rules of professional secrecy governing the practice of law in Colombia, **LIBE LEGAL SOLUTIONS S.A.S** undertakes to maintain the confidentiality of all information received from its clients in the context of professional relationships. The lawyers of **LIBE LEGAL SOLUTIONS S.A.S** are obliged to maintain the professional secrecy of the **Personal Data** and other information known to them by reason of their profession and may only use it for the purposes proper to the provision of the legal services entrusted to them. This duty of confidentiality extends even after the termination of the professional relationship with the client.

Additionally, **LIBE LEGAL SOLUTIONS S.A.S** may process **Personal Data** related to legal services, such as information on judicial, arbitration or administrative proceedings, as well as information on counterparties, including sensitive personal data, for the proper provision of legal advisory services, in accordance with Article 6 (d) and Article 26 (f) of Law 1581 of 2012.

### 3. Mechanisms for the collection of your Personal Data

**Personal Data** may be obtained through the following mechanisms:

- (i) **Directly:** By means of the information provided directly by the holder, through the different contact channels, registration and applications, such as the website, telephone calls or events.
- (ii) **Directly through social networks and messaging services:** **LIBE LEGAL SOLUTIONS S.A.S** operates in different social networks and messaging services, through which **Personal Data** may be obtained:
- (iii) **Within the framework of the provision of legal services:** During the professional relationship with clients, we process **Personal Data** for the proper provision of legal advisory services, including information on judicial, arbitration or administrative proceedings in which the client is a party, as

well as any other information relevant to the case in question. This data will be treated in strict compliance with the rules of professional secrecy.

#### 4. Security in the processing of Personal Data

**LIBE LEGAL SOLUTIONS S.A.S.** shall have in place technical, physical and organizational security measures proportional to the sensitivity and volume of data to be processed, to maintain the security and confidentiality of **Personal Data**.

The processing of **Personal Data** shall be carried out in accordance with the principles of the personal data protection regime, including the restricted circulation of information, so that only **LIBE LEGAL SOLUTIONS S.A.S.** personnel with functions related to the processing of **Personal Data** shall have access to such data.

Additionally, in accordance with the duty of confidentiality derived from professional secrecy, **LIBE LEGAL SOLUTIONS S.A.S.** applies security measures to protect the privileged information of its clients. This includes: (i) Restricted access to clients' **Personal Data**, allowed only to lawyers and support staff directly involved in the provision of legal services. ii) Signing of confidentiality agreements or clauses by all the firm's personnel, including lawyers, paralegals, and administrative staff. (ii) Implementation of internal policies on handling confidential and privileged information.

#### 5. Purposes of Personal Data Processing

Customers **Personal Data** will be processed for the following purposes:

- a) Provision of legal services: To use the information for the adequate representation of the client in judicial, arbitration, administrative or any other type of legal proceedings.
- b) Client relationship management: Maintain contact with clients, provide information on the status of their inquiries and cases, information that may be relevant to them, respond to requests and requirements, and in general, manage the professional relationship.
- c) Billing and collection: Generate bills for given services, manage the collection of fees, and perform the corresponding tax reports.
- d) Statistical and service improvement purposes: Analyze aggregated or anonymized information to evaluate and improve the quality of services, identify trends, and generate statistical reports.
- e) Accounting, economic and tax management: Accounting of the firm, generation of financial statements, and compliance with tax obligations.
- f) Marketing and commercial communications: Send communications about events, publications, and services offered by the firm that may be of interest to customers.
- g) Prevention of money laundering and financing of terrorism: Comply with the obligations derived from the Self-Control and ML/FT Risk Management System, including the consultation in restrictive lists and the collection of information on the origin of the client's resources.
- h) Transfer or transmission of data: Sharing **Personal Data** with authorized third parties, for purposes related to the provision of legal services, and subject to the rules on professional secrecy.
- i) Keeping historical records: Maintain a historical file of the cases and clients handled, as part of the firm's document management, and for statistical and research purposes.

#### 6. Holder's rights

The following are the rights of the owners regarding the processing of their **Personal Data**:

- a) **Consultation:**

- Access free of charge to the **Personal Data**, which have been subject to processing, at least once every calendar month, and whenever there are substantial modifications to this **Privacy Policy**.
- To be informed about the processing of **Personal Data**.
- Request proof of the authorization granted for the processing of **Personal Data**, except when it is exempted as a requirement for the processing.

b) **Claims:**

- Update and/or rectify **Personal Data** in case of partial, inaccurate, incomplete, fractioned or misleading data.
- To revoke the authorization and/or request the deletion of **Personal Data**, if there is no legal or contractual obligation that requires keeping them in the database.
- To denounce the breach of any of the obligations of **LIBE LEGAL SOLUTIONS S.A.S.** or third parties, in relation to the processing of **Personal Data**.

- c) File complaints before the Superintendence of Industry and Commerce for violations of the provisions of the current regulations on the protection of **Personal Data**.

## 7. Procedures for the exercise of rights with respect to the processing of Personal Data

The customer service area is the unit in charge of processing the requests of the holders to enforce their rights.

By means of electronic communication to the e-mail [admin@libelegal.com](mailto:admin@libelegal.com), the holder may make inquiries or claims, providing the following information:

- a) Full name.
- b) Accreditation of the capacity under which he/she acts (as owner of personal data or on behalf of a third party).
- c) Contact information (address, e-mail and telephone numbers).
- d) Reason(S)/facts) giving rise to the consultation or claim with brief description of the right to be exercised (access to **Personal Data**, know, update, rectify, request proof of authorization, revoke authorization, delete, report breach of duties).
- e) The documents to be asserted.
- f) Signature (if applicable) and identification number.

### 7.1. Consultation Procedure

The holder, its assignees, representatives or attorneys-in-fact may make inquiries about their **Personal Data** (request proof of authorization, access to **Personal Data** and know the treatment that has been given to them), according to the following procedure:

- a) Once submitted, the request will be analyzed to verify the identity of the holder. If the request is made by a person other than the owner and it is not accredited that the person is acting on behalf of the owner, the request will be rejected.
- b) All queries will be answered within a maximum term of 10 working days from the day following the date of receipt thereof. When it is not possible to attend the consultation within such term, the holder will be informed of such situation, stating the reasons for the delay and indicating the date on which the Consultation will be attended, which, in no case, may exceed 5 working days following the expiration of the first term.

## 7.2. Procedure for the presentation of Claims

The holder, his assignees, representatives or attorneys-in-fact may file a Claim regarding his **Personal Data** (correction, updating or deletion, or when he notices the alleged breach of any of the duties of **LIBE LEGAL SOLUTIONS S.A.S** in connection with the processing of his **Personal Data**), in accordance with the following procedure:

- a) Once submitted, the request will be analyzed to verify the identity of the holder. If the request is made by a person other than the owner and it is not accredited that the person is acting on behalf of the owner, the request will be rejected.
- b) If the claim is incomplete, **LIBE LEGAL SOLUTIONS S.A.S.** will require the holder to correct the omissions within 5 days of receipt of the claim. After 2 months from the date of the requirement without correcting the omissions, it will be understood that the claim has been withdrawn.
- c) If the area that receives the claim is not competent to resolve it, it will transfer it to the appropriate person within a maximum term of 2 working days and will inform the holder of this situation.
- d) The maximum term to address the claim will be 15 working days from the day following the date of receipt of the claim. When it is not possible to address the claim within that period, the holder will be informed of the situation, stating the reasons for the delay and indicating the date on which the Consultation will be addressed, which, in no case, may exceed 8 working days following the expiration of the first term.

## **8. Procedural requirement**

Once the terms have been complied with, the holder who is denied, totally or partially, the exercise of his rights may inform the Superintendence of Industry and Commerce.

## **9. Personal Data Suppression Policies**

The Personal Data will remain in the databases of **LIBE LEGAL SOLUTIONS S.A.S.** only for the time that is reasonable and necessary for the fulfillment of the purposes that justify the processing, such as the provision of legal services, the management of the relationship with the client, and the fulfillment of legal and contractual obligations. The above, without prejudice to the need to retain certain data for additional periods in response to requirements of judicial or administrative authorities, or for the defense of the interests of the firm or its clients in the context of legal proceedings.

In the absence of legal mandate, court order or contractual obligation requiring the continuity of the processing, **LIBE LEGAL SOLUTIONS S.A.S.** will proceed with the deletion of the **Personal Data** once the purposes of the processing have been fulfilled, or when requested by the owner, under the terms of this Policy. The deletion will be carried out within 15 working days following the request, extendable only once for a maximum of 8 working days.

## **10. Validity and modification**

This **Privacy Policy** is effective as of April 21, 2025.

This Policy may be modified by **LIBE LEGAL SOLUTIONS S.A.S.** when required, without prior notice to the holder, if it does not involve changes to the identity of **LIBE LEGAL SOLUTIONS S.A.S.** or the purposes of the processing.