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|  <p>Tone flowers TONÉ FLOWERS S.A.S - NIT: 900 014 838-0</p> | DATA PROCESSING POLICY | | Version: 0 |
| | | | Code: PR 038 |
| | ELABORATED: Administrative Director | Date: December 2014 | Revised: Administrative Director |
| | | | Approved: GENERAL MANAGER |

1. OBJECTIVE

Establish the criteria on the obtention, collection, use, treatment, processing, exchange, transfer and transmission of personal data, in compliance with and development of the constitutional right of all persons to know, update, and rectify for the information collected on them in databases.

2. RANGE

This policy applies to all holders of personal information that you use and/or are in the databases of TONE FLOWERS S.A.S., who acts as responsible for the processing of personal data.

3. LEGAL FRAMEWORK

- Constitution Article 15.
- Law 1266 of 2008
- law 1581 de 2012
- Regulatory Decrees 1727 of 2009 and 2952 of 2010 and Partial Regulatory Decree No. 1377 of 2013.
- Judgments of the constitutional court C-1011 of 2008 and C-748 of 2011

4. DEFINITIONS

Personal Data: Any information that may be associated with one or more specific or indeterminate natural persons.

Authorization: Prior, express and given consent of the owner to carry out the processing of personal data.

Database: Set of personal data that is subject to treatment.

Personal data: Any information linked to or associated with one or several natural persons determined or determinable.


Responsible for the treatment: Natural or legal person, public or private, that by itself or in association with others, perform the processing of personal data on behalf of the controller.

Responsible for the treatment: Natural or legal person, public or private, that by itself or in association with others, decides on the database and / or the treatment of the data.

Owner: Natural person whose personal data are subject to treatment.

Treatment: Any operation or set of operations on personal data, stories such as collection, storage, use, circulation or deletion.

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| Produced By : Administrative Director | Reviewed By: | Approved By: |
| Appointment: Administrative Director | Appointment: Administrative Director | Appointment: General Manager |

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5. BEGINNINGS

TONE FLOWERS S.A.S will apply the following principles, which constitute the rules to follow in the collection, handling, use, treatment, storage and exchange of Personal data:

a) Principle of legality: In the use, capture, collection and processing of personal data, will be applied to the current and applicable provisions governing the processing of personal data and other related fundamental rights.

b) Principle of freedom: The use, capture, collection and processing of personal data can only be carried out with the prior, express and informed consent of the Holder. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal, statutory, or judicial mandate that relieves consent.

c) Principle of purpose: The use, capture, collection and processing of personal data to which it has access and are collected and collected by TONE FLOWERS SAS, will be subordinated and will serve a legitimate purpose, which should be informed to the respective owner of the personal information.

d) Principle of truth or quality: The information subject to use, capture, collection and processing of personal data must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.

e) Principle of transparency: In the use, capture, collection and processing of personal data must guarantee the right of the Owner to obtain TONE FLOWERS SAS, at any time and without restrictions, information about the existence of any information or data personal that is of your interest or ownership.


f) Principle of access and restricted circulation: Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication.

g) Principle of security: The personal data and information used, captured, collected and subject to treatment by TONE FLOWERS SAS, will be subject to protection to the extent that the technical resources and minimum standards so permit, through the adoption of technological measures of protection, and all kinds of administrative measures that are necessary to grant security of the electronic registries and repositories avoiding their adulteration, modification, loss, consultation, and in general against any use or unauthorized access.

h) Principle of confidentiality: Each and every one of the people who manage, manage, update or have access to information of any kind that is in bases or data bank, undertake to keep and keep strictly confidential and not disclose to third parties, all personal, commercial, accounting, technical, commercial or any other information provided in the execution and exercise of their functions.

6. SENSITIVE DATA

Are those that affect the privacy of the owner or whose misuse can generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, Human Rights or that promotes the interests and guarantees of opposition political parties, as well as data related to health, sexual life and biometric data, among others, the capture of a still image or movement, fingerprints, photographs, iris, voice recognition, facial or palm, etc.

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Treatment of sensitive data: It will be possible to use and process data classified as sensitive when:

- a) The owner has given his explicit authorization to said treatment, except in the cases that by law the granting of said authorization is not required.
- b) The treatment is necessary to safeguard the vital interest of the holder and this is physically or legally incapacitated. In these events, the legal representatives must grant their authorization.
- c) The treatment refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process.
- d) The treatment has a historical, statistical or scientific purpose. In this event, the measures leading to the suppression of identity of the holders must be adopted.

7. AUTHORIZATION OF THE HOLDER

Without prejudice to the exceptions provided for in the law, the prior authorization, express and informed by the owner, must be obtained in the treatment, which must be obtained by any means that may be subject to further consultation and verification.


The authorization of the owner will not be necessary in the case of:

- a) Information required by a public or administrative entity in the exercise of its legal functions or by judicial order.
- b) Data of a public nature.
- c) Medical or sanitary emergency cases.
- d) Treatment of information authorized by law for historical, statistical or scientific purposes.
- e) Data related to the Civil Registry of Persons.

8. DUTIES OF TONE FLOWERS S.A.S. AS RESPONSIBLE FOR THE TREATMENT

When TONE FLORES acts as Responsible for the processing of personal data, it will comply with the following requirements: a) Guarantee to the owner, at all times, the full and effective exercise of the right of habeas data.

- b) Request and keep, copy of the respective authorization granted by the owner.
- c) Properly inform the owner about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
- d) Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- e) Ensure that the information provided to the person in charge of processing is true, complete, accurate, updated, verifiable and understandable.
- f) Update the information, communicating in a timely manner to the data processor, all the news regarding the data previously provided and adopt the other necessary measures so that the information provided to it is kept up-to-date.
- g) Rectify the information when it is incorrect and communicate the pertinent information to the person in charge of the treatment.

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- h) Provide the person in charge of processing, as the case may be, only data whose treatment is previously authorized.
- i) To demand from the person in charge of the treatment at all times, respect for the security and privacy conditions of the holder's information.
- j) Process the queries and claims made.
- k) Inform the data processor when certain information is under discussion by the owner, once the claim has been filed and the respective procedure has not been completed.
- l) Inform at the request of the owner about the use given to their data.
- m) Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the owners.

9. AUTHORIZATIONS AND CONSENT

The collection, storage, use, circulation or deletion of personal data by TONE FLOWERS S.A.S., requires the free, prior, express and informed consent of the owner thereof.

For this purpose, it will use the mechanisms currently available to maintain records or technical mechanisms of when and how it obtained authorization from the holders of personal data for the treatment thereof. To comply with the above, physical files or electronic repositories made directly or through third parties hired for that purpose may be established.

10. PRIVACY NOTICE

The Privacy Notice for the treatment of personal data, (attached) is the physical document, electronic or in any other known or unknown format, which is made available to the owner for the processing of their personal data. Through this document, the owner is informed of the information regarding the existence of the information processing policies that will be applicable to them, the way to access them and the characteristics of the treatment intended to be given to personal data.


11. CONSULTATIONS

The holders, or their successors in title, may consult the personal information of the owner that rests in any database. Consequently, TONE FLOWERS S.A.S., will guarantee the right of consultation, providing the holders, all the information contained in the individual record or that is linked to the identification of the owner.

With respect to the attention of requests of consultation of personal information TONE FLOWERS S.A.S guarantees:

- a) Enable means of electronic communication or others that it considers pertinent.
- b) The requests for consultation, they will be attended within a maximum term of ten (10) business days from the date of receipt. When it is not possible to attend the consultation within said term, the interested party will be informed before the expiration of the 10 days, stating the reasons for the delay and indicating the date on which the consultation will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

12. CLAIMS

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The owner or his successors who consider that the information contained in a database must be subject to correction, updating or deletion, or when they notice the alleged breach of any of the duties contained in the Law, may submit a claim to the Responsible Party. Treatment, channeling and sending it through the designated channel.

The claim may be presented by the owner, taking into account the information indicated in article 15 of Law 1581 of 2012 and in decree 1377 of 2013, and other regulations that modify or add them.

13. PROCEDURE TO GUARANTEE THE RIGHT TO SUBMIT CLAIMS

At any time and for free, the owner or his representative may request TONE FLOWERS S.A.S, the rectification, update or deletion of their personal data, with proof of identity. The rights of rectification, updating or deletion may only be exercised by: a) The owner or his successors in title, after proof of his identity, or through electronic instruments that allow him to identify himself. b) Your representative, after accreditation of the representation. c) When the request is made by a person other than the owner, the personería or mandate to act must be accredited in due form; and in case of not accrediting such quality, the request will be considered as not submitted. d) The request for rectification, updating or deletion must be submitted through the means provided by TONE FLOWERS S.A.S indicated in the privacy notice and contain, as a minimum, the following information: The name and contact information of the owner, to receive the answer. The documents that prove the identity or personality of your representative. The clear and precise description of the personal data with respect to which the owner seeks to exercise any of the rights.


14. REVOCATION OF THE AUTHORIZATION AND / OR DELETION OF DATA

Holders may at any time request TONE FLOWERS SAS the deletion of their personal data and / or revoke the authorization granted for the treatment thereof, by submitting a claim, in accordance with the provisions of Article 15 of the Law 1581 of 2012. The request for suppression of the information and the revocation of the authorization will not proceed when the holder has a legal or contractual duty to remain in the database. It should be borne in mind that there are two ways in which revocation of consent can occur:

- The first one can be about the totality of the consented purposes, that is, that TONE FLOWERS S.A.S should stop dealing with the owner's data completely;
- The second can occur on certain types of treatment, that is, the partial revocation of consent.

If the respective legal term has expired, the person in charge and / or the person in charge, as the case may be, has not eliminated the personal data, the owner will have the right to request the Superintendence of Industry and Commerce to order the revocation of the authorization and / or the deletion of personal data. For these purposes, the procedure described in article 22 of Law 1581 of 2012 will be applied.

15. CONTROL OF CHANGES

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