

PRIVACY POLICY AND PROCESSING OF PERSONAL DATA NOVAFEM S.A.S.

In compliance with the provisions of Article 15 of the Political Constitution of 1991, as well as Law 1581 of 2012, Decree 1377 of 2013 and Decree 886 of 2014, we hereby present the Privacy and Personal Data Protection Policy (hereinafter the “*Policy*”) of Novafem S.A.S., which we will apply to the extent that you provide your personal data that we will include in our databases.

1. Identification of the Data Controller and Processor of Personal Data

- Company name: Novafem S.A.S. (hereinafter “*Novafem*”);
- Address: Carrera 16 No. 88 – 81, Bogotá D.C., Colombia;
- Email: shernandez@babynovaclinic.com;
- Telephone: +57 3009121727

2. Object

This Policy is the document that governs the handling of all Databases and/or files of *Novafem* that contain Personal Data, which will be used or processed in our capacity as Processors and/or Controllers thereof. The rules of the Policy are mandatory and must be strictly adhered to by *Novafem*, its administrators, partners, employees and the contractors and/or third parties acting on behalf of *Novafem*. Therefore, those mentioned above must observe and respect these policies in the performance of their duties.

Likewise, the Policy regulates the handling of information and the processing of Personal Data that occurs on Digital Platforms and Social Networks of *Novafem*, to the personal data of subscribers during the registration process on these platforms and, in general, during the execution of the services provided on these platforms.

3. Definitions

The following are a series of terms relevant to understanding the scope of application of this Policy:

1. Authorization: Prior, express and informed consent of the data subject to carry out the Processing of Personal Data. This may be written, verbal or through unequivocal conduct that reasonably allows the conclusion that the data subject granted authorization;
2. Database: Any organized set of Personal Data that is subject to Processing;
3. Consultation: Request from the data subject or persons authorized by the data subject or by law to know the information is kept about him or her in databases or files;
4. Personal data: Any information and/or image linked or that may be associated with one or more specific or identifiable natural person and legal entities;
5. Private Personal Data: It is data that, due to its intimate or confidential nature, is only relevant to the person who owns the data. *Illustrative examples*: merchants' books, private documents, information obtained from the inspection of the premises;
6. Public Personal Data: Data that is not semi-private, private, or sensitive. *Illustrative examples*: data relating to the civil status of persons, their profession or occupation and their status as a merchant or public servant;
7. Semi-private Personal Data: Semi-private data refers to information that is neither intimate, confidential or public and whose knowledge or disclosure may be of interest not only to the data subject but also to a specific sector, group of individuals or society in general;
8. Sensitive Personal Data: Those that affect the privacy of the Holder or whose improper use may affect the privacy of the Holder or the potential to generate discrimination against them. *Illustrative examples*: racial or ethnic origin, political orientation, religious or philosophical beliefs, trade union membership, as well as data relating to health, sexual or gender life or orientation and biometric data (fingerprints, among others);
9. Data Controller: Natural person and legal entities, public or private, who, alone or in association with others, carries out the Processing of Personal Data on behalf of the Data Controller;
10. Digital Platforms and Social Networks: These are the website and social media *Facebook, Instagram, YouTube* and Ovu of Novafem;

11. Complaint: Request submitted by the data subject or by law to correct, update or delete their personal data or when the data subject identifies an alleged breach of the data protection regime, according to article 15 of Law 1581 of 2012;
12. Data Controller: Natural person and legal entities, public or private, who, alone or in association with others, decides on the Database and/or the Processing of the data;
13. Titular or Holder: Natural person and legal entities whose Personal Data is subject to Processing;
14. Data transfer: Action that takes place when the Controller and/or Processor of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is a Controller and is located inside or outside the country;
15. Data transmission: Action that involves the communication of the same within or outside the territory of the Republic of Colombia when its purpose is the performance of a Processing by the Processor on behalf of the Controller; and
16. Treatment: Any operation or set of operations on Personal Data, such as its collection, storage, use, circulation, transmission, transfer, marketing or delete.

4. The role of Novafem in processing personal data

In developing its corporate purpose and economic activity, *Novafem* acts as the Controller and/or Processor of Personal Data contained in its Databases. Consequently, *Novafem* collects, stores, uses, transmits, transfers and deletes Personal Data of natural or legal persons that have been provided directly to *Novafem*.

It is important to note that the personal information that will be processed has reached *Novafem* by the voluntary declaration of the Holder to deliver this.

5. Use of the Privacy and Information Protection Policy

Novafem will process Personal Data to fulfill the activities inherent to its corporate purpose. In any case, *Novafem* is committed to the security and proper use of the personal data provided to it and, therefore, undertakes to use such data appropriately, as well as to maintain the required confidentiality in accordance with this Policy and applicable legislation.

The Personal Data that is provided to *Novafem*, whether in physical, automated, or digital form, will be processed in accordance with this Policy. Therefore, when the Data Subject registers their Personal Data on Digital Platforms and Social Networks of *Novafem* by registering, you acknowledge and understand that this registration is subject to this Policy and, therefore, expressly recognize and authorize the use and processing of your Personal Information for the purposes and in the manner indicated herein:

Processing of Personal Data and General Purposes

1. To exercise their right to adequately know, the user with whom they intend to establish relationships, provide services, and to assess the present or future risk of the same relationships and services;
2. Carry out the necessary procedures for the development of the pre-contractual, contractual and post-contractual stages with *Novafem*, with respect to any of the products or services offered by *Novafem*, whether or not it has acquired or with respect to any underlying business relationship it has with it, as well as complying with Colombian or foreign law and the orders of judicial or administrative authorities;
3. Perform marketing, sales and promotional activities, telemarketing, customer service, brand activation, activities, prizes and promotions, directly or through third parties derived from commercial alliances or any other link;
4. Implement strategies for engaging and building long term relationships with users, customers, suppliers, shareholders, and other third parties with whom *Novafem* has relationships of any nature;
5. Sending invitations to events, improving or offering products, services and all those activities associated with the existing relationship or link with *Novafem* or whoever he might have;
6. To order, catalog, classify, divide or separate the information provided by data subjects;
7. To verify, corroborate, check, validate, investigate or compare the information provided by data subjects, with any information that is legitimately available, such as business relationships;
8. To collect, store and process all information provided by the Personal Data Holders in one or more databases, in the format that *Novafem* deems most appropriate;

9. Control access to *Novafem* and establish security measures, including the establishment of video-monitored areas;
10. Prevent, monitor, detect, investigate, analyze and/or control threats or incidents to computer or information security and implement the relevant measures to resolve them;
11. Conduct the due diligence and knowledge process;
12. Prevention, detection, monitoring and control of money laundering and terrorist financing;
13. To respond to inquiries, requests, complaints and claims made by Data Subjects and control entities and to transmit Personal Data to other authorities that, under applicable law, must receive Personal Data;
14. Manage information systems, accounting, billing and audits, processing and verification of means of payment, accounting records and payment control, settlement and reporting of taxes, benefits;
15. To supply, share, send or deliver your personal data to insurance companies, legal advisors, tax authorities, administrative authorities, referral agencies and patients, judicial authorities, and suppliers or third parties in joint operations that process, manage or use the information, for the execution of contracts or agreements entered into with *Novafem*;
16. Transfer and/or transmit the collected information to different areas of *Novafem*, and/or to the parent company, its affiliates, subsidiaries, as well as related companies in Colombia and abroad, when necessary for the development of its operations (*Accounts receivable and administrative collections, treasury, accounting, analytics and statistics, business intelligence, risk analysis, security, among others*);
17. To insert and develop Sensitive Personal Data and biometrics into *Novafem*'s artificial intelligence platforms and systems, for the purposes described in this Policy; and
18. Transfer and/or transmit the collected information to the different business partners or patients of *Novafem*, when necessary for the development of its operations.

The Personal Data provided to *Novafem*, they may be transferred and transmitted to third parties and to judicial or administrative authorities, whether natural or legal persons, national or foreign, in those circumstances in which is considered that the Transfer or Transmission of Personal Data is necessary to carry out the uses and activities authorized in accordance with our corporate purpose.

Specifically, but not limited to, *Novafem* informs that it may use service providers and data processors working on behalf of *Novafem*. These may include system hosting and maintenance services, analytics services, email messaging services, delivery services, payment transaction management, artificial intelligence systems, and credit and address checks, among others. Therefore, the Data Subject acknowledges and understands that, by providing information to *Novafem* by using this service, you are automatically and expressly granting these third parties authorization to access your Personal Information, along with its affiliates and related entities.

Novafem has undertaken and will undertake all necessary measures to ensure that both the service providers and data processors described above, as well as its parent companies, affiliates and subsidiaries, business partners and other authorized third parties under this Policy, protect, in all events, the confidentiality of the Personal Data under their control.

In the event that Personal Data is exchanged between the Data Subjects, it will be the responsibility of each one and *Novafem* shall not, under any circumstances, be responsible for this data processing between Data Subjects. Therefore, *Novafem* recommends the proper use of the data exchanged between Data Subjects in accordance with the guidelines of this Policy, and to give it absolute confidentiality as established in the Terms and Conditions.

In any case, the Data Subjects will be responsible for the veracity of the data provided, reserving the right to *Novafem* the right to exclude from its platforms any Holder who has provided false data.

Novafem may collect information that is in the public domain to supplement its databases. This information will be treated as Public Personal Data.

6. Principles for Treatment

The processing of Personal Data must be carried out in accordance with the general and specific regulations on the matter and for activities permitted by law. The following principles will be applied harmoniously and comprehensively in the development, interpretation, and application of this Policy:

6.1. Principles related to the collection of Personal Data

6.1.1. Principle of freedom: Unless otherwise provided by law, data collection may only be carried out with the prior, express, and informed consent of the Data Subject. Personal Data may not be obtained or disclosed without the prior consent of the Data Subject, or in the absence of a legal or judicial mandate that waives the requirement for consent.

The Data Subject must be informed clearly, sufficiently and in advance about the purpose of the information provided and, therefore, data may not be collected without a clear specification of its purpose.

The principle of freedom must be observed both in the case of data collected through forms and data that is part of the annexes or documents that the data subjects provide to *Novafem*.

6.1.2. Principle of limiting the collection: Only personal data that is strictly necessary for the purposes of the processing should be collected, so the registration and disclosure of data that is not closely related to the objective of the processing is prohibited.

Therefore, every reasonable effort must be made to limit the processing of personal data to the minimum necessary. That is, the data must be: (1) suitable;(2) relevant; and (3) in accordance with the purposes for which they were intended.

6.2. Principles related to the use of Personal Data

6.2.1. Principle of purpose: The processing must be for a legitimate purpose in accordance with the Constitution and the law, which must be communicated to the data subject.

Novafem the data controller must inform the data subject clearly, sufficiently and in advance about the purpose of the information provided and, therefore, data may not be collected without a specific purpose.

6.2.2. Principle of temporality: Personal Data will be retained only for the reasonable and necessary time to fulfill the purpose of the processing and the legal requirements or instructions of supervisory and control authorities or other competent authorities. Personal Data will be retained when necessary for compliance with a legal or contractual obligation. To determine the processing period, the regulations applicable to each purpose and the administrative, accounting, tax, legal, and historical aspects of the information will be considered.

6.3. Principles related to information quality

6.3.1. Principle of truthfulness or quality: The information subject to processing must be truthful, complete, accurate, up-to-date, verifiable, and understandable. The processing of partial, incomplete, fragmented, or misleading data is prohibited. Reasonable measures must be taken to ensure that the data are accurate and sufficient, and, when requested by the Data Subject or when *Novafem* so determines, they shall be updated, rectified or deleted when appropriate.

6.4. Principles related to the protection, access and circulation of Personal Data

- 6.4.1. Safety principle: Each person linked to *Novafem* must comply with the technical, human and administrative measures that *Novafem* establish to ensure the security of Personal Data by preventing its alteration, loss, consultation, use or unauthorized or fraudulent access.
- 6.4.2. Principle of transparency: In the processing, the data subject's right to obtain information must be guaranteed at any time and without restrictions, information about the existence of Personal Data that concerns you.
- 6.4.3. Principle of restricted access: Access to Personal Data will only be permitted to the following individuals: **(1)** to the Holder; **(2)** to persons authorized by the Holder; and **(3)** to persons who by legal mandate or court order are authorized to know the information of the data subject.
- 6.4.4. Principle of restricted circulation: Personal data may only be sent or supplied to the following people: **(1)** to the Holder; **(2)** to persons authorized by the Holder; and **(3)** to persons who by legal mandate or court order are authorized to know the information of the data subject.
- 6.4.5. Principle of confidentiality: All persons involved in the processing of Personal Data that is not of a public nature are obliged to guarantee the confidentiality of the information, even after their relationship with any of the tasks that comprise the processing has ended, and may only supply or communicate Personal Data when it corresponds to the development of the activities authorized by law.

7. Rights of the Personal Data Subject

The Data Subject shall have the following rights:

- 7.1. The right to know, update and rectify your Personal Data free of charge;
- 7.2. The right to request proof of the existence of the authorization granted, except when expressly exempted by law as a requirement for processing, that is, when it involves: **(1)** information required by a public or administrative entity in the exercise of its legal functions or by court order; **(2)** data of a public nature; **(3)** cases of medical or health emergency; **(4)** processing of information authorized by law for historical, statistical or scientific purposes; and **(5)** data related to the Civil Registry of Persons;

- 7.3. The right to be informed, upon request, regarding the use that has been made of your Personal Data;
- 7.4. The right to file complaints with the Superintendency of Industry and Commerce for violations of the provisions of current regulations;
- 7.5. The right to revoke authorization and request the deletion of Personal Data when it is not used in accordance with the authorized uses and purposes. Revocation and/or deletion will proceed when the Superintendency of Industry and Commerce has determined that the Processing of *Novafem* has engaged in conduct contrary to current regulations; and
- 7.6. The right to submit inquiries and complaints regarding your Personal Data and to access your personal data that has been processed free of charge.

Single paragraph – Cookies: *Novafem* uses "Cookies" for logging into its services, as well as to personalize and improve the online user experience. A "Cookie" is a text file located on your hard drive or device. The "Cookies" contain information, including Personal Data, that a web server may subsequently read in the domain that assigned it the "Cookies" this information includes the date and time of the visit, registration information, and browsing and purchase history.

Novafem works with external partners who use "Cookies" on our site to:

- To measure and analyze the aggregate usage and volume of statistical information from users of the digital platforms. The data collected may include, but is not limited to, the following: users browser activity when visiting digital platforms, the path users follow on the platforms, general information about users internet service provider and host, and/or the number of times they access the site;
- Save previous searches for products and services by users and dynamically display the most relevant content for them;
- To record user behavior on the platforms of *Novafem*. For example, the pages they have visited, the forms they have completed, and the products and services they have purchased to create personalized ads and communications better suited to their needs;
- Evaluate user traffic and behavior on digital platforms to prepare activity reports exclusively for internal use;

- Conduct research and diagnostics to improve the products, services, and digital platforms of *Novafem*; and
- Identify those users who arrive at digital platforms through an invitation from an associated website or application or sponsored link.

This policy only covers the use of the “*Cookies*” on behalf of *Novafem* and not by third parties.

The user has the option to accept or reject the “*Cookies*” considering that the digital platforms of *Novafem* are designed to work optimally with the “*Cookies*” enabled in the browser. If the user decides to reject cookies, they may not be able to log in or use other interactive features of digital platforms and services that depend on them.

8. Duties of Novafem as Data Controller

All those required to comply with this Policy should bear in mind that *Novafem* is obligated to fulfill duties imposed by current regulations. Therefore, they must act in such a way as to ensure compliance with the following obligations:

8.1. Duties of *Novafem* regarding the Holder

- 8.1.1. To guarantee the Data Subject, at all times, the full and effective exercise of the right of *habeas data*, that is, to know, update or rectify their personal data;
- 8.1.2. Request and retain, under the conditions set out in this Privacy Policy, a copy of the respective authorization granted by the owner;
- 8.1.3. Inform the Data Subject clearly and sufficiently about the purpose of the collection and the rights they have by virtue of the authorization granted;
- 8.1.4. To inform the Data Subject, upon request, about the use given to their Personal Data; and
- 8.1.5. To process inquiries and complaints made in accordance with the terms set out in this Privacy Policy.

8.2. Duties of *Novafem* regarding the quality, security and confidentiality of Personal Data

- 8.2.1. Observe the principles of truthfulness or quality, security and confidentiality under the terms established in this Privacy Policy;

- 8.2.2. To keep the information under the necessary security conditions to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access;
- 8.2.3. Inform the data protection authority when security code violations occur and there are risks in the management of the information of the Data Subjects;
- 8.2.4. Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce;
- 8.2.5. Update the information when necessary; and
- 8.2.6. Rectify Personal Data when appropriate.

8.3. Duties of *Novafem* when the Treatment is carried out through a Processor

- 8.3.1. Provide the Data Controller only with Personal Data whose processing has been previously authorized;
- 8.3.2. Ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable;
- 8.3.3. Inform the Data Controller in a timely manner of any changes to the data previously provided and take all other necessary measures to ensure that the information provided to the Data Controller remains up to date;
- 8.3.4. Inform the Data Controller in a timely manner of any corrections made to the Personal Data so that they can make the necessary adjustments;
- 8.3.5. Require the Data Processor at all times to respect the security and privacy conditions of the Data Subject information;
- 8.3.6. Inform the Data Controller when certain information is under discussion by the Data Subject, once the complaint has been filed and the respective process has not been completed;

8.4. Duties of *Novafem* as Data Processor

And *Novafem*, if it process Personal Data on behalf of another entity or organization (Data Controller), it must comply with the following duties:

- 8.4.1. To guarantee the Holder, at all times, the full and effective exercise of the right of habeas data;
- 8.4.2. To keep the information under the necessary security conditions to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access;
- 8.4.3. To promptly update, rectify or delete Personal Data;
- 8.4.4. Update the information reported by the Data Controllers within five (5) business days from the date of receipt;
- 8.4.5. To process inquiries and complaints made by the Data Subjects in accordance with the terms set out in this policy;
- 8.4.6. Adopt an internal manual of policies and procedures to ensure proper compliance with this law and, in particular, to address inquiries and complaints from Data Subjects;
- 8.4.7. Register the legend "*claim in process*" in the manner regulated by law;
- 8.4.8. Insert the legend "information under judicial discussion" into the database once notified by the competent authority of legal proceedings related to the quality of the personal data;
- 8.4.9. Refrain from circulating information that is being disputed by the owner and whose blocking has been ordered by the Superintendency of Industry and Commerce;
- 8.4.10. Allow access to the information only to persons authorized by the Holder or empowered by law for that purpose;
- 8.4.11. Report to the Superintendency of Industry and Commerce any violations of security codes and risks in the management of data subjects' information; and
- 8.4.12. Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

9. **Authorization**

Those required to comply with this Policy must obtain the prior, express, and informed consent of the Data Subject to collect and process their Personal Data. This obligation is not necessary when dealing with Public Data.

To obtain authorization, the following guidelines must be followed:

Before the person authorizes, it is necessary to inform them clearly and expressly of the following:

- The processing to which your personal data will be subjected and the purpose of this processing;
- The optional nature of the response to the questions asked, when these deal with sensitive data or with the data of girls, boys and adolescents;
- The rights you have as the Data Subject; and
- The identification, physical or electronic address of *Novafem*.

Novafem will obtain the consent of the Data Subject through any means that may be subject to subsequent verification, such as, but not limited to, the website, forms, formats, activities, contests whether in person or on social networks, complaints, claims, data messages or applications. Proof of compliance with the obligation to inform and of consent obtained must be kept.

Authorization may also be obtained through the unequivocal conduct of the Data Subject that reasonably allows the conclusion that they have consented to the processing of their information. Such conduct must be very clear so as not to admit any doubt or mistake regarding the intent to authorize the processing.

Authorization for the Processing of Personal Data of children

When it comes to the collection and processing of data from children, the following requirements must be met:

- The authorization must be granted by persons who are empowered to represent the minors; the representative of the minors must guarantee their right to be heard and value their opinion of the treatment, taking into account the maturity, autonomy and capacity of the minors to understand the matter; and
- It should be noted that answering questions about the data of the minors is optional.

10. Communications

By accepting this Privacy Policy, the Data Holder agrees to receive communications from *Novafem* through any of the following means: email, alerts/notifications, website posts, app posts, social media posts, and phone calls, among others.

These communications will include topics such as changes in registered information, subscription expirations, confirmation of some actions you take as a user when using the services, announcements indicating topics or categories of photos and/or videos that are being requested by users, service satisfaction surveys, studies that allow us to study your behavior, preferences, habits, offers and promotions among other purposes as will be described later in this document.

11. Personal Information Collected

The Personal Data that will be collected and processed includes, but is not limited to, the following:

1. Full name of the Data Subject;
2. ID;
3. Birthdate;
4. Nationality;
5. Sex;
6. Home;
7. Image;
8. Biometric data;
9. Contact address;
10. Contact phone numbers;
11. Email;
12. Professional Information;
13. Patient clinical information including personal, family and epidemiological history, results of diagnostic support tests, medical orders, consultations performed, medications received, diagnoses, medical and health team assessments, surgical procedures, etc;
14. Personal habits;
15. Your Benefit Plan Administrator (EPS, EPS-S, ARL, Complementary Care Plan -PAC-, Prepaid Medicine, Health Policy, etc.);

16. Information from social media accounts to the extent that they use and connect to *Novafem's* services through them;
17. Information related to the electronic devices that the Holder uses to access our platforms;
18. The date and time of access to the platform;
19. The IP address from which the platform was accessed; and
20. The number of visitors who access.

12. Special policies and their purposes

12.1. Processing of Personal Data of patients, family members and/or companions

Novafem collects the personal data of its patients and/or users and stores them in a database that is classified as confidential, and will only be disclosed with the authorization of the owner or when a Competent Authority requests it.

The purposes for which they are used will be:

1. Process, confirm, schedule and provide the requested health services;
2. Request authorization from the appropriate party, located in the country or abroad, depending on the insurer, for the provision of the required health services;
3. To transmit your data to collaborating foundations, surrogates, referral agencies and/or other third parties when necessary;
4. Requesting from third parties the supplies, products or services required for the provision of health services;
5. To conduct studies, research, publications, and advertising messages;
6. Prepare and present statistical, analytical, epidemiological, risk reports, DRG construction (*Diagnosis-Related Groups*), among others, that allow for the optimization of the services provided by *Novafem*;
7. Reproducing photographs and/or publishing information in communications, newsletters or publications of *Novafem*;
8. Contact the Data Subject in order to evaluate the quality and/or satisfaction of the health services received;

9. To advise and/or support the provision of services outside *Novafem*'s corporate purpose, or that are not provided by the company, but are required by patients, family members and/or companions;

12.2. Processing of Personal Data of Surrogates

Novafem collects the personal data of surrogates who enter its surrogacy programs and stores it in a database which is classified as confidential, and will only be revealed with the authorization of the owner or when a Competent Authority requests it.

The purposes for which they are used will be:

1. Maintain accurate and up-to-date medical records to ensure optimal health care during the pregnancy process;
2. Facilitate the planning and execution of medical procedures necessary for safe pregnancy and childbirth;
3. To enable effective communication between the medical team, the surrogate and other professionals involved in the process, ensuring proper coordination of care;
4. To transmit the data to intended parents, referral agencies and/or other third parties when necessary;
5. Comply with the jurisprudential and regulatory obligations related to surrogacy and the protection of personal data;
6. Facilitate participation in authorized scientific studies that may benefit medical advancement in the field of fertility and pregnancy;
7. To protect the rights and legitimate interests of all parties involved in the surrogacy process;
8. Properly manage the administrative aspects related to the surrogacy process;
9. Implement appropriate security measures to protect personal data against unauthorized access, loss, or alteration;

10. To provide educational information and relevant resources about the surrogacy process and prenatal care; and
11. Obtain and manage the informed consent of the pregnant person in a transparent and ethical manner.

12.3. Processing of Personal Data of Gamete Donors

Novafem collects the personal data of gamete donors who enter its fertility programs and gamete bank and stores it in a database which is classified as confidential, and will only be revealed with the authorization of the owner or when a Competent Authority requests it.

The purposes for which they are used will be:

1. Evaluate the suitability of the donor through medical, genetic and psychological examinations to ensure the clinical and ethical suitability of the process;
2. Coordinate and execute all stages of the gamete donation process, including appointments, medical procedures, follow-ups and necessary communications;
3. Comply with the requirements established by national and international legislation on health, bioethics, fertility and personal data protection;
4. Maintain a clinical and genetic history of the donor, as well as the records necessary to ensure the traceability and control of the genetic material;
5. To assess and manage potential health risks for the recipient, the unborn child, and the donor, based on their genetic and medical information;
6. Inserting and operating Sensitive Personal Data and biometrics in the artificial intelligence platforms and systems of *Novafem* in order to anonymize the identity of donors and prevent them from being searched for on digital platforms;
7. Facilitate communication with the donor regarding matters related to their participation in the process, test results, side effects, medical follow-up, or administrative issues;
8. Use the anonymized donor data for the purposes of scientific research, preparation of internal statistics or improvement of medical processes, respecting their privacy and anonymity;

9. Anonymized donor data for the purpose of offering gamete banking services to patients, intended parents and/or other users of *Novafem*;
10. Manage the logistical aspects related to the donation process;
11. To respond to requests from health, judicial, or regulatory authorities that legally require access to certain donor information; and
12. To ensure the protection of the donor's identity against third parties, especially in anonymous assisted reproduction processes, as determined by law or the consent given.

12.4. Processing of Personal Data of Affiliated Physicians

Novafem collects the personal data of its affiliated physicians and stores it in a database which is classified as confidential, and will only be revealed with the authorization of the owner or when a Competent Authority requests it.

The purposes for which they are used will be:

1. Develop the affiliation process;
2. Prepare management reports for the affiliation scheme;
3. Manage internal users and applications;
4. Publish information in the institutional directory;
5. Publish information of interest to patients and the community on Digital Platforms and Social Networks of *Novafem*;
6. Measure productivity and implement loyalty programs;
7. Reproducing photographs and/or publishing information in communications, newsletters or publications of *Novafem*; and
8. Sharing Personal Data with third parties for the celebration and/or execution of legal acts or businesses related to the development of benefit plans of any nature, in favor of the Holder.

12.5. Processing of Personal Data of employees and contractors

Novafem collects the personal data of its employees and contractors, which are classified as confidential and will only be disclosed by the company with the authorization of the Data Subject or when requested by a competent authority.

The purposes for which they are used will be:

1. To comply with the obligations imposed on employers by Colombian labor legislation, or with the orders issued by competent Colombian or foreign authorities;
2. Issue certifications relating to the Holder's relationship with *Novafem*;
3. To comply with the obligations imposed on *Novafem* as an employer, in relation to Occupational Health and Safety standards, and the so-called Occupational Health and Safety Management System;
4. Comply with the applicable biosafety protocols;
5. Manage the functions performed by employees and/or contractors;
6. Consult memos or warnings;
7. Develop and implement the disciplinary process;
8. Establish communication in emergency situations;
9. To carry out monitoring, tracking and evaluation of employees and/or contractors
10. Protect confidential and proprietary materials;
11. Taking photographs and fingerprints necessary for the recognition of the worker and/or contractor, compliance control and collection of evidence of the services developed;
12. Communicating employee information to third-party entities with which *Novafem* maintains a contractual relationship, including applicants, suppliers, collaborators, sponsors, partners or consortia and clients, to the extent necessary to comply with the third party's protocol, with the sole purpose of enabling them to manage control and coordination regarding the personnel that

effectively provide the services derived from the professional relationship, as well as to enable compliance with legal obligations, in tax and social security matters;

13. Carry out international transfer or transmission of data to countries that provide protection similar to that of Colombia, as is the case of associated companies located abroad;
14. To provide information to third parties responsible for evaluation, training, certification, and other processes required in the development of the contractual relationship;
15. Verify, compare, and evaluate the work and personal skills of employees;
16. Sending information to compensation funds, AFP, ARL, insurance companies, among others;
17. Initiate internal investigations based on complaints filed by customers, third parties, or other employees;
18. Handling complaints against workers for workplace harassment or violation of codes of conduct;
19. To comply with the regulations on the prevention of money laundering and terrorist financing (SARLAFT); and
20. Manage the extra-legal benefits that the company grants to employees.

Novafem stores the personal data of its employees and/or contractors, including data obtained during the selection process, in a folder identified with each name. Only the Human Resources Department will have access to and process this folder. *Novafem*, for the purpose of managing the contractual relationship between the employee and/or the contractor.

Novafem processes sensitive personal data of its employees, such as fingerprints and image capture through biometric control, for the sole purpose of controlling access to company facilities and providing safe working environments. For the purposes of this processing, the corresponding authorization is obtained, which in all cases will be express and optional, clearly indicating the sensitive personal data being processed and its purpose. Likewise, the company will have robust security systems in place for the handling and confidentiality of this sensitive data, with the understanding that such sensitive data will only be used by *Novafem*, for the aforementioned purposes.

Once the employment relationship has ended, *Novafem* will proceed to store all personal data obtained from the selection process and documentation generated during the employment relationship in a file

central with restricted access, subjecting the information at all times to appropriate security measures and levels, given that employment information may contain sensitive data.

In any case, the information will not be processed for a period exceeding twenty (20) years from the termination of the employment relationship, or in accordance with the legal or contractual circumstances that make it necessary to handle the information.

12.6. Processing of Customer Personal Data

Novafem collects the personal data of its clients and stores it in a database which is classified as confidential, and will only be disclosed with the authorization of the owner or when requested by a Competent Authority.

The purposes for which they are used will be:

1. Process of controlling and recording accounting obligations contracted with clients;
2. Compliance with tax and legal requirements before public and regulatory entities;
3. Compliance with contractual obligations, for which the information may be transferred to third parties, such as financial entities, notaries, OFAC and terrorism lists, lawyers, etc.;
4. Compliance with judicial decisions and administrative, legal, fiscal and regulatory provisions;
5. Transmission of information and personal data in audit processes;
6. Administrative management for the execution of the pre-contractual, contractual and post-contractual stages;
7. Client creation on the platforms or software of *Novafem*; and
8. Transfer or transmit information of interest to its subsidiaries or allies.

12.7. Processing of Personal Data of suppliers or contractors

Novafem collects the personal data of its suppliers and contractors and stores it in a database which, although mostly composed of public data, is classified by the company as confidential. In the case of private data, *Novafem* will only disclose them with the authorization of the holder or when requested by a Competent Authority.

The purposes for which they are used will be:

1. Carry out supplier evaluation and selection processes;
2. Processes for linking and creating the supplier in the information systems of *Novafem*;
3. Compliance with tax and legal requirements before public and regulatory entities;
4. Establish business relationships to acquire goods or services;
5. To manage and control payments made for goods and services received;
6. Qualitative and quantitative evaluations of the levels of service received from suppliers;
7. To comply with the obligations and requirements established in the Quality Management System;
8. Communication of policies and procedures on how to do business with suppliers;
9. Process of controlling and recording accounting obligations contracted with suppliers;
10. Consultations, audits and reviews arising from the business relationship with the supplier;
11. Sending invitations to hire and carrying out procedures for the pre-contractual, contractual and post-contractual stages;
12. Sending invitations to events scheduled by *Novafem* or its associates;
13. The others specifically established in the authorizations granted by the suppliers themselves; and
14. Conduct security studies of suppliers in accordance with the requirements of the SARLAFT system.

12.8. Processing of Personal Data of attendees at events organized by Novafem and its purposes

Novafem collects the personal data of those attending events organized by *Novafem*, which are classified as reserved, and will only be disclosed by *Novafem* with the authorization of the Owner or when requested by a competent authority.

The purposes for which they are used will be:

1. Sending information, inviting people to future events, preparing statistics and conducting studies in various areas, among other things;
2. Commercial or advertising partnership for future *Novafem* events;
3. Sending information of interest about the event being attended, as well as future events;
4. Compliance with legal requirements;
5. Compliance with contractual obligations;
6. Transmission of information and personal data in audit processes; and
7. Administrative management.

12.9. Processing of Personal Data on the Digital Platforms and Social Networks of Novafem

Novafem collects private personal data from third parties through its website or social networks and stores it in a database which is classified by the company as confidential, and will only be revealed with the authorization of the owner or when a Competent Authority requests it.

The purposes for which they are used will be:

1. Allow communication with customers or third parties through the contact us section;
2. To promote local and global products and brands;
3. Publish events, contests, promotions or news of interest;
4. To receive and process consumer complaints and claims;
5. Legal, accounting, administrative, commercial, promotional, informational, marketing and sales purposes;

6. Conduct promotional, marketing, and advertising campaigns;
7. To guarantee the rights that individuals have under the Consumer Statute (Law 1480 of 2011); and
8. Send the terms and conditions of each of the promotions or contests that Novafem may carry out.

12.10. Processing of Personal Data from the inactive (historical) file

Novafem maintains databases with inactive information of workers, suppliers, contractors, clients and in general all inactive data of the organization and stores them in a database which is classified by the company as confidential, and will only be revealed with the authorization of the owner or when a Competent Authority requests it.

The purposes for which they are used will be:

1. To comply with the General Archives Law (Law 594 of 2000);
 1. Having the documentation organized in such a way that corporate information is retrievable for use by *Novafem* in service of the interested holder;
 2. Record the information produced or received by *Novafem* due to their activities or functions;
 3. To carry out activities related to the entirety of archival work, from the creation of the document to its disposal or permanent preservation; and
 4. To carry out document management processes aimed at the planning, handling and organization of the documentation produced and received by *Novafem* from its origin to its final destination, in order to facilitate its use and conservation.

In any case, the information will not be processed for a period longer than the terms stipulated by current regulations and in accordance with the life cycle of the documents that are kept therein.

12.11. Processing of Personal Data from the Management File (Active Information)

However as a supervised entity, *Novafem* maintains databases containing active information on patients, workers, suppliers, contractors, clients and organization's active billing. This information

is stored in a database which is classified by the company as confidential, and will only be disclosed with the authorization of the owner or when requested by a Competent Authority.

The purposes for which they are used will be:

1. Comply with national archival regulations (Resolution 8934 of 2014) and ensure the proper production, reception, distribution, organization, conservation, recovery and timely consultation of archival documents;
2. Prepare a document management program, retention schedules and the internal archive regulations in accordance with current regulations;
3. Ensure the standardized and hierarchical categorization, planning, storage and purging of documents;
4. To properly apply the various archival tools that contribute to the optimal performance of document management; and
5. To guarantee access to and easy consultation of information, as well as its proper preservation.

13. International Transfer and Transmission of Personal Data

At the moment, *Novafem* does not perform international transfers or transmissions of personal data related to information contained in its databases. In the event that it becomes necessary to carry out such transfer, it will verify that the destination country meets the standards that guarantee an adequate level of protection of personal data, in accordance with the Single Circular of the Superintendency of Industry and Commerce.

Additionally, *Novafem* may carry out international transmission of personal data through different computer programs management systems whose servers are located in a country other than Colombian territory; the foregoing, in order to manage all internal processes of *Novafem*. In any case, in addition to having the express and unequivocal authorization of the Owner, *Novafem* will be ensured that the action provides adequate levels of data protection and meets the requirements set in Colombia by the regime of Habeas Data.

On the other hand, when *Novafem* decides to carry out an International Data Transfer other than the one previously mentioned, it may do so without the authorization of the data subjects, provided that it guarantees the security and confidentiality of the information, as well as the conditions that regulate the scope of the processing of the data, in accordance with the provisions of Law 1581 of 2012.

14. Confidentiality of Personal Information

The Personal Information that the Holder provides will be used solely by *Novafem*, its associates and third parties authorized for such purposes, in accordance with the provisions of both the authorization and this Privacy Policy. Personal Information will not be used, under any circumstances, for purposes other than those for which it was provided, which is why *Novafem* will endeavor to protect the privacy of Personal Information and keep it under the necessary security conditions to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access, as well as respect for the rights of the Owners thereof.

In the event that administrative, judicial or any other competent authority requests to know the Personal Information held by *Novafem* and consequently, it is their legal obligation to provide it, *Novafem* will proceed to deliver that Information and the Holders accept and authorize *Novafem* for that purpose. The Company will keep the Data Subject informed of the request, as well as any development or additional request that may exist in relation to it.

The present obligation of confidentiality of Personal Information will have an unlimited duration, that is, the obligation subsists over time.

15. Procedures for Consultation, Rectification and Complaints in relation to Personal Data

15.1. Consultation: Inquiries and requests will be addressed within a maximum of ten (10) business days from the date of receipt. If it is not possible to resolve the inquiry within this timeframe, the notification address provided in the inquiry will be sent, and the response period will be extended by up to five (5) additional business days. Responses to inquiries or complaints submitted to *Novafem* may be delivered by any electronic means.

15.2. Corrections and Claims: In those events where the Data Subject considers that their information should be corrected, updated or deleted, or when they notice an alleged breach by *Novafem* regarding their duties in matters of Personal Data Protection, the Data Subject may file a complaint as follows:

- You must submit a written request in response to the specific requirement;
- If the claim is incomplete, *Novafem* will require the petitioner within five (5) business days following receipt of the request to complete and correct it:

- If two (2) months elapse from the date of the request without a response having been given, the claim will be considered withdrawn; and
- If the person receiving the complaint is not competent to resolve it, they will forward it to the person who is competent to resolve it within a maximum period of two (2) business days and will inform of this fact.

If the claim is received in full or has been completed subsequently, *Novafem* will include, within the next two (2) business days, a “*claim*” in the database that indicates “*Claim in Process*”.

The claim will be resolved within a maximum of fifteen (15) business days, starting from the day after it is received. If it is not possible to resolve the inquiry within this period, *Novafem* will inform of the delay, the reasons and the response date at the notification address that has been included in the respective claim.

In any case, the response time may not exceed eight (8) business days following the expiration of the initial period. Responses to submitted claims may be delivered by any physical or electronic means.

15.3. Minimum content of the consultation or complaint request

Requests submitted by the data subject to make an inquiry or complaint regarding the use and handling of their personal data must contain certain minimum specifications in order to provide the data subject with a clear and coherent response to their request. The requirements for the request are:

- To be directed at *Novafem*;
- Contain the identification of the Holder (Name and Identification Document);
- Include a description of the facts that motivate the inquiry or complaint;
- The purpose of the request;
- Please provide the notification address to the Holder, physical and/or electronic (email); and
- Attach the documents you wish to use as evidence (especially for claims).

In the event that the inquiry or complaint is submitted in person, the Holder must put their request or complaint in writing without any formality other than the requirements demanded above.

16. Person Responsible for Data Processing at Novafem

In the event of any doubt or concern regarding this Privacy Policy or the Processing and use of Personal Information, it is necessary to direct inquiries, requests, complaints or claims to:

Legal Representative of *Novafem* to the email address: shernandez@babynovaclinica.com.

17. Modifications

Novafem informs that it may modify this Privacy Policy, and will inform interested parties accordingly.

18. Validity

This Privacy Policy has an indefinite validity and will come into effect on February 2, 2026.