

# Personal Data Processing Policy

CARTAGENA TRAVEL GROUP S.A.S.

## INTRODUCTION

The Political Constitution of Colombia, Law 1581 of 2012, and Decree 1377 of 2013 establish the framework for the protection of personal data in Colombia. Personal data is understood as any information linked to, or that may identify, a natural person, such as name, contact details, age, identification number, marital status, address, among others. In accordance with these regulations, every individual has the right to know, update, and rectify the information collected or subject to processing by public or private entities.

CARTAGENA TRAVEL GROUP S.A.S. (hereinafter, **CARTAGENA TRAVEL GROUP**) has collected, stored, and used personal information within the scope of its corporate activities and, in compliance with the applicable regulations, intends to continue such processing in the future.

This document sets forth the policies governing the collection, storage, use, processing, and protection of personal data. It is mandatory for CARTAGENA TRAVEL GROUP, its employees, contractors, suppliers, and third parties who, by obligation or assignment, act as data processors or have access to such information.

The company will request proper authorization from data holders to collect, store, use, and process the information supplied, which will be included in physical and/or electronic databases. The information will be used strictly for the corporate purposes of CARTAGENA TRAVEL GROUP, which include the provision of health tourism services, as well as administrative, commercial, promotional, and communication purposes.

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## 1. DEFINITIONS

- **Authorization:** Prior, express, and informed consent granted by the Data Holder for the processing of personal data.
- **Database:** Organized set of personal data, whether electronic or physical, subject to processing.
- **Personal Data:** Any information associated with a natural person that allows direct or indirect identification.
- **Public Data:** Data not classified as private, semi-private, or sensitive, and available for free consultation (e.g., marital status, public documents).

- **Sensitive Data:** Data that affect the privacy of the holder or may generate discrimination (e.g., health, ethnicity, religion, political orientation, biometric information).
  - **Data Holder:** The natural person whose personal data is subject to processing.
  - **Responsible Party:** The natural or legal person who decides on the collection and processing of personal data.
  - **Processor:** A natural or legal person who processes data on behalf of the responsible party.
  - **Treatment:** Any operation performed on personal data, including collection, storage, use, circulation, and deletion.
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## 2. PRINCIPLES FOR DATA PROCESSING

CARTAGENA TRAVEL GROUP will apply the following principles in the handling of personal data:

- **Legality:** All processing will be carried out under current law.
  - **Purpose:** Data will only be collected for legitimate and informed purposes.
  - **Freedom:** Processing requires prior and express consent.
  - **Truthfulness:** Information must be complete, accurate, and up to date.
  - **Transparency:** The holder may request information regarding their data at any time.
  - **Restricted Access:** Data will only be available to authorized persons.
  - **Security:** Technical, human, and administrative measures will be implemented to safeguard information.
  - **Confidentiality:** Non-public data will remain private even after the end of the relationship with the data holder.
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## 3. RIGHTS OF DATA HOLDERS

Holders of personal data have the following rights:

- Access, update, rectify, and delete their information.
  - Request proof of authorization granted for processing.
  - Be informed about the use of their data.
  - Revoke authorization and/or request deletion of data when appropriate.
  - File complaints with the Superintendence of Industry and Commerce for violations of data protection regulations.
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## 4. DUTIES OF CARTAGENA TRAVEL GROUP

As the entity responsible for data processing, CARTAGENA TRAVEL GROUP undertakes to:

- Guarantee the exercise of habeas data rights at all times.
  - Request and keep evidence of data holder authorization.
  - Inform holders about the purpose of data collection.
  - Implement security measures to prevent unauthorized access, alteration, or loss.
  - Ensure that information remains accurate and updated.
  - Respond to inquiries, requests, and claims within legal deadlines.
  - Notify the competent authorities in case of security incidents that compromise personal data.
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## 5. PURPOSES OF DATA PROCESSING

Personal data collected will be used for:

- **Patients and clients:** Managing reservations, medical tourism packages, diagnostic procedures, recovery services, billing, follow-ups, and communication regarding health-related services.
- **Suppliers and contractors:** Compliance with service agreements, commercial obligations, audits, and legal requirements.

- **Employees and candidates:** Human resources management, payroll, contracts, social security, evaluations, and recruitment processes.

Sensitive health data will only be processed with explicit authorization and exclusively for the provision of health services or when required by law.

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## 6. CHILDREN AND ADOLESCENTS

CARTAGENA TRAVEL GROUP will only process personal data of minors when it is public in nature or when processing is essential to protect their best interests and fundamental rights, always with the consent of their parents or legal guardians.

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## 7. PROCEDURES FOR INQUIRIES AND CLAIMS

Data holders may exercise their rights by submitting requests to the email: **info@ctgtravelgroup.co**

Requests must include:

- Date of application.
- Copy of identification document.
- Contact information for notifications.
- Signature of the applicant.

**Response times:**

- Inquiries will be addressed within **10 business days**. If additional time is required, the holder will be notified and the response will not exceed **5 additional business days**.
  - Claims will be addressed within **15 business days**. If additional time is required, the holder will be notified and the response will not exceed **8 additional business days**.
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## 8. DATA SECURITY MEASURES

CARTAGENA TRAVEL GROUP implements encryption, restricted access controls, internal audits, and monitoring systems to prevent unauthorized access, misuse, or disclosure of personal data.

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## 9. VALIDITY AND UPDATES

This policy takes effect as of **August 2025** and will remain in force until a new version is issued. Any modifications will be communicated through the website <https://ctgtravelgroup.co> or via other effective channels.

