

## **Data Processing and Privacy Policy of Latin Magic Agency**

In compliance with the provisions of Law 1581 of 2012 and its Regulatory Decree 1377 of 2013, as well as Regulatory Decrees 1727 of 2009, 2952 of 2010, and 1377 of 2013, and Constitutional Court rulings C-1018 of 2008 and C-748 of 2011, LATIN MAGIC AGENCY adopts this Data Processing Policy (hereinafter referred to as "The Policy"), which will be communicated to all data owners whose information is collected or may be obtained in the future.

Through this policy, we inform you about the collection and use of your personal data by LATIN MAGIC AGENCY, as well as the options available for you to exercise your rights and maintain control over your personal data.

We recommend reading this Data Processing and Privacy Policy carefully before using our services and providing personal data.

LATIN MAGIC AGENCY reserves the right to modify this Data Processing and Privacy Policy at any time, especially in response to legislative or jurisprudential changes that affect the processing of personal data. The new version will come into effect on the date of the last modification. In case of substantial changes, they will be published on our website. We also recommend periodically reviewing the Data Processing and Privacy Policy to stay informed about changes and updates.

LATIN MAGIC AGENCY guarantees the rights to privacy, intimacy, and a good name in the processing of personal data. Consequently, all actions taken by the company will be governed by the principles of legality, purpose, freedom, truthfulness or quality, transparency, restricted access and circulation, security, and confidentiality.

All individuals who provide personal data to LATIN MAGIC AGENCY may access, update, rectify, delete, or revoke the previously granted authorization.

We are committed to protecting the privacy of our users. We understand that visitors and users of the website are concerned about their privacy, as well as the confidentiality and security of the personal data they provide.

We will only collect, use, and disclose personal data in accordance with this Privacy Policy and the applicable laws in the jurisdictions where we collect personal data. If there is any inconsistency between this Privacy Policy and an applicable law, the relevant law will prevail to the extent of such inconsistency.

The data controller for the website is LATIN MAGIC AGENCY.

We have designated a Data Protection Officer ("DPO") responsible for overseeing questions related to this Privacy Policy. If you have any questions about this Privacy Policy or your general privacy rights, please contact the DPO at [latinmagicagency@gmail.com](mailto:latinmagicagency@gmail.com).

## **DATA COLLECTION AND PROCESSING**

When we collect your personal data, it will be done based on the following grounds:

### **1. Contractual Services**

When you create an account through our website and request services from us, we need to collect and use your personal data to:

- Enter into our agreement with you.
- Provide you with our services available through our website.
- Legitimate Business Purposes

When we do not collect or use your personal data for contractual purposes, we may still collect and use your data if we consider that:

- You will not be negatively affected by our collection and use.
- Such collection and use align with what you would reasonably expect in the context of our use of your personal data.
- It is necessary to fulfill our legitimate interests, such as improving our website or the range of services we offer.

### **2. Legal Compliance**

In certain situations, we may be required to process your personal data to comply with legal obligations, such as responding to court orders or regulatory requirements.

### **3. Your Consent**

By accessing and using the website, you consent to the collection and use of your personal data under the terms of this Privacy Policy. When registering an account or logging in as a member on the website or a related website, you consent to the collection and use of your personal and special category personal data.

You may withdraw your consent at any time by ceasing to use the website or deleting your account. Requests for account suspension or deletion can be made through your account or by contacting us using the provided contact information.

## DEFINITIONS

- **Database:** An organized set of personal data that is subject to processing.
- **Personal Data:** Any information linked to or that may be associated with one or more identified or identifiable natural persons.
- **Data Processor:** A natural or legal person, public or private, who, alone or in association with others, processes personal data on behalf of the Data Controller.
- **Data Controller:** A natural or legal person, public or private, who, alone or in association with others, decides on the database and/or the processing of data, in this case, **LATIN MAGIC AGENCY**.
- **Authorization:** The prior, express, and informed consent of the Data Subject to carry out the processing of personal data.
- **Data Subject:** A natural person whose personal data is subject to processing.
- **Processing:** Any operation or set of operations performed on personal data, such as collection, storage, use, circulation, or deletion.
- **Natural Person:** A human being who exercises rights and fulfills obligations in a personal capacity.
- **Third Party:** Any natural or legal person who is not directly affiliated with **LATIN MAGIC AGENCY**.
- **Sensitive Data:** Data that affects the privacy of the Data Subject or whose misuse could result in discrimination.
- **Public Data:** Data that is neither semi-private, private, nor sensitive and may be contained in public records, official bulletins, judicial rulings, or similar sources.
- **Private Data:** Data that, due to its intimate or reserved nature, is only relevant to the data subject.
- **Semi-private Data:** Data that is neither intimate, reserved, nor public and whose knowledge or disclosure may be of interest not only to the data subject but also to a specific sector or society in general.
- **Connection and Usage Data:** Information regarding downloaded files, domain names, landing pages, browsing activity, viewed and clicked content or advertisements, access dates and times, pages visited, forms completed or partially completed, search terms, uploads or downloads, email openings, interactions with email content, access times, error logs, and other similar information.

- **Social Media Information:** If you access through a third-party connection or login, we may have access to the information you provide to that social network, such as your name, email address, friend list, profile picture, gender, location, and current city, as well as any information you provide directly through **LATIN MAGIC AGENCY's** profiles on social media and blogging platforms (e.g., Facebook, Instagram, and X).

## **OBJECTIVE**

The purpose of this policy is to define the general guidelines for compliance with Law 1581 of 2012 and Decree 1377 of 2013 in Colombia, which regulates the management of personal databases. Under this policy, criteria will be established for the collection, storage, use, circulation, and deletion of personal data processed by LATIN MAGIC AGENCY.

## **SCOPE**

This policy applies to all personal information recorded in the databases of LATIN MAGIC AGENCY, which will act as the entity responsible for the processing of personal data, including personal information, collection, storage, and management of images, photos, and videos.

## **OBLIGATION**

This policy is mandatory for LATIN MAGIC AGENCY.

## **PURPOSE**

The personal data of the owners held by LATIN MAGIC AGENCY will be collected, used, transmitted, transferred, stored, and processed for the following purposes:

1. Responding to requests for the purchase of event packages where potential couples will be put in contact, as LATIN MAGIC AGENCY is a matchmaking agency between Colombians and foreigners. This includes scheduling events, arranging meetings, collecting images and videos, and processing requests for suggestions, petitions, complaints, claims, and congratulations made by the data owners.
2. Transmitting the personal data of the owners to regulatory bodies and other authorities if required by law.

- 3.** Conducting marketing and/or promotional activities related to products and commercial campaigns generated by LATIN MAGIC AGENCY.
- 4.** Conducting marketing and/or promotional activities for third-party services with which LATIN MAGIC AGENCY has a commercial relationship.
- 5.** Sending information about new products and services.
- 6.** Sending information about advertising campaigns.
- 7.** Conducting demand definition studies and analyzing services provided by LATIN MAGIC AGENCY and its events, such as tours, travel, lodging, or its commercial partners, whether as strategic contacts, partners, investors, advisors, or administrators.
- 8.** Strengthening relationships with consumers and clients through the provision of relevant information and evaluation of service quality.
- 9.** Improving, promoting, and developing the products and services of LATIN MAGIC AGENCY and its commercial partners.
- 10.** Updating data and identification documents.
- 11.** Billing for services or products acquired, such as packages for traveling to the country to meet a potential spouse for marriage, which are valued at approximately \$3,000 USD (subject to seasonal variations and availability) and monthly subscriptions ranging from \$15 to \$25 USD (subject to annual increases).
- 12.** Determining pending obligations, consulting financial information and credit history, generating reports, and filing complaints if necessary, particularly in cases of unusual behavior by subscribers towards LATIN MAGIC AGENCY personnel or any of its strategic and commercial partners.
- 13.** Registering personal data, images, photos, and videos of data owners in LATIN MAGIC AGENCY's information systems and commercial and operational databases.
- 14.** Conducting any other activity similar to those previously described that is necessary for the development of LATIN MAGIC AGENCY's corporate purpose.
- 15.** Maintaining dynamic and fluid communication through any means, including our main website (<https://latinmagicagency.com/>), social media, and instant messaging platforms (including WhatsApp). This is to respond to any information requests and provide customer service and technical support. Additionally, information and updates about our services will be provided (e.g., updates about services, new features in user accounts, or notifications regarding commercial transactions). In these cases, besides the application of LATIN MAGIC AGENCY's Privacy Policy, the

Privacy Policy of the corresponding social network or instant messaging platform will also apply. We recommend reviewing these Privacy Policies in detail.

16. Analyzing incoming and outgoing telephone call recordings for service quality, internal issue resolution, and improvement or development of new products and services.
17. Personalizing the user experience: conducting analyses, research, and reports to better understand how our services are used, to improve them; developing new products and services; creating and updating audience segments that may be used for advertising and targeted marketing on third-party services, platforms, and mobile applications.
18. Fraud prevention and website security: Analyzing content with the LATIN MAGIC AGENCY team to verify the lawful use of our services. This analysis is conducted to prevent potential fraud, illegal activities, violations of our policies, or any applicable regulations; monitoring, preventing, and detecting potential incidents; and combating spam, malware, or security risks.

## **GENERAL CONDITIONS**

To comply with Law 1581 of 2012 on personal data protection, the following considerations must be taken into account:

1. LATIN MAGIC AGENCY is responsible for processing its own personal databases.
2. Third parties with access to databases will be considered Data Processors and must comply with Law 1581 of 2012, Decree 1377 of 2013, and other complementary regulations, as well as this Policy.
3. The law is mandatory throughout Colombian territory, and for the transmission of personal data to other countries, their legislation must include security measures equal to or superior to those contained in the referenced law.
4. Personal databases at LATIN MAGIC AGENCY include all data collected from natural persons, whether suppliers, clients, consumers, volunteers, employees, or any other individuals whose information is subject to processing. The policy does not apply in cases where: a) Databases and files are intended for national security and defense, as well as the prevention, detection, monitoring, and control of money laundering and terrorism financing. b) Databases contain intelligence and counterintelligence information. c) Databases and files relate to journalistic and editorial content.

## **SPECIFIC CONDITIONS AND PRIVACY**

The following specific conditions must be considered:

1. Any employee who establishes a working relationship, provides services, has a work or service contract, or any other type of contractual relationship with LATIN MAGIC AGENCY must include a clause in their employment contract expressing their commitment to comply with Law 1581 of 2012 and Decree 1377 of 2013. Compliance with these regulations must also be included in the internal work regulations to ensure ethical data handling.
2. Any third party requiring access to LATIN MAGIC AGENCY's personal databases must include a contractual clause acknowledging their obligation to comply with data protection regulations and must obtain prior authorization from the Data Owner to process their personal data.
3. All suppliers, clients, consumers, employees, and any other persons whose information is processed by LATIN MAGIC AGENCY must provide written authorization for their data to be processed without restrictions, covering all necessary purposes of the agency.
4. The authorization must also clarify that Data Owners are responsible for keeping their information accurate and updated, promptly notifying LATIN MAGIC AGENCY of any changes.
5. All personal databases managed by LATIN MAGIC AGENCY must be backed up to ensure data recovery.
6. Access to personal databases must be limited. When databases are sent through mass communication channels, they must be password-protected to restrict access.
7. Personal databases should not be published in internal emails or online platforms without access restrictions.
8. LATIN MAGIC AGENCY will periodically launch campaigns to update its personal databases.

For personal database processing, all relevant departments must have written procedures ensuring compliance with this policy and Law 1581 of 2012 and Decree 1377 of 2013.

LATIN MAGIC AGENCY must establish a procedure to handle inquiries and complaints, ensuring compliance with legal requirements.

## **DATA PROCESSING RESPONSIBLE PARTIES**

The following information pertains to personal data processing at LATIN MAGIC AGENCY:

- LATIN MAGIC AGENCY, identified with NIT 1037670208-4, with its principal address in Medellín, Republic of Colombia. Website: <https://latinmagicagency.com>.

## **PROCESSING OF SENSITIVE DATA**

If responsible parties process sensitive data, they must obtain prior and explicit authorization for its processing, ensuring compliance with the following obligations:

1. The Data Owner must be informed that providing sensitive data is not mandatory. However, given the nature of our agency, access to such information may be necessary to join our matrimonial agency community.
2. The Data Owner must be informed explicitly and in advance about the sensitive data involved and the purpose of its processing.
3. No activity will be conditioned on the provision of sensitive data by the Data Owner.

## **RIGHTS OF DATA OWNERS**

As personal data owners, individuals have the following rights:

1. Free access to their data that has been processed, clarifying that such information is only collected when a subscription is purchased or a matrimonial agency package is acquired.
2. The right to know, update, and rectify their information when it is partial, inaccurate, incomplete, or misleading, or when its processing is unauthorized or prohibited.
3. The right to request proof of the authorization granted.
4. The right to file complaints with the Superintendency of Industry and Commerce for violations of the applicable regulations.
5. The right to revoke authorization or request data deletion, provided there is no legal or contractual obligation preventing their removal.
6. The right to abstain from answering questions related to sensitive data. Responses regarding sensitive data or minors' data will always be optional.



## **DATA RETENTION PERIOD**

The retention period for personal data will vary depending on the service contracted. In any case, data will be stored during the contractual relationship. Once the contract ends, data will be blocked for the legally required retention period and will be available to competent authorities to address potential liabilities arising from processing.

## **REQUESTS, INQUIRIES, AND COMPLAINTS HANDLING**

To submit inquiries, complaints, request more information, consult personal data, request modifications, updates, rectifications, or deletions, or revoke authorization for data processing, individuals can contact LATIN MAGIC AGENCY via email at latinmagicagency@gmail.com or by phone at +57 3024367272.

The Customer Service department will handle requests from consumers and clients, while the Procurement department will manage requests from suppliers.

Any individual affiliated with LATIN MAGIC AGENCY by any means may approach these departments for data-related requests.

## **PROCEDURE FOR EXERCISING THE RIGHT TO HABEAS DATA**

In compliance with personal data protection regulations, LATIN MAGIC AGENCY, acting as the data controller, has established the following procedure and minimum requirements for exercising data protection rights:

To file a petition, complaint, or request, the following information must be provided:

- Full name and surname of the Data Owner.
- Contact details (physical address, email, phone number).
- Reasons or facts justifying the complaint, petition, or request, including a brief description of the right to be exercised (access, update, rectification, request for authorization proof, revocation, deletion, etc.).
- Signature (if possible).
- Identification number.

Upon receiving this information, LATIN MAGIC AGENCY has a maximum term of fifteen (15) business days from the day following the petition, inquiry, or complaint to respond. If the request cannot be addressed within this period, the responsible party will inform the Data Owner of the delay and provide a new resolution date, which may not exceed eight (8) additional business days. If the Data Owner is denied total or partial exercise of their rights,

they may escalate the case to the Superintendency of Industry and Commerce – Delegation for Data Protection.

### **INTERNATIONAL TRANSFER OR TRANSMISSION OF PERSONAL DATA**

LATIN MAGIC AGENCY may transfer and transmit personal data, including internationally, as long as legal requirements are met. Data Owners must explicitly authorize such transfers and transmissions. LATIN MAGIC AGENCY will ensure that third parties acknowledge and comply with this policy, using received personal data only for authorized purposes.

### **PROCESSING OF MINORS' DATA**

Processing of children's and adolescents' personal data is prohibited unless the data is public and the processing complies with the following:

- The processing respects the best interests of minors.
- The fundamental rights of minors are ensured.

**Note:** LATIN MAGIC AGENCY does not collect, store, or process minors' data. To join our matrimonial agency, all subscribers must be **adults**.

### **VALIDITY**

This Personal Data Processing Policy is effective from the date of publication.

Personal databases will be maintained as long as the contractual relationship with the Data Owner exists or until the Data Owner requests data deletion, provided there is no legal obligation to retain them.