

POLICY FOR PERSONAL DATA PROCESSING

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SUMMARY

This document presents the policy for processing of personal data adopted by Tenaris Tubo Caribe Ltda for the basis of existing personal data in the enterprise so that the existing legal framework on privacy and processing of personal data is followed and are guaranteed the right of habeas data that every citizen in Colombia. Similarly welcomes this policy program management personal data (pgdp) in context with the implementation of safety management system of Tenaris Tubo Caribe Ltda.

Información del documento

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1. PURPOSE, SCOPE AND USERS

The purpose of this policy is to give legal effect to the provisions existing in Colombia for data protection and privacy of personal information, particularly to enacting law 1581 of 2012 by which general provisions for the protection of personal data are held and decree 1377 of 2013 by which partially regulates law 1581 of 2012 and any other legislation to be issued in reference to compliance with article 15 of the constitution of Colombia and as such guarantee the right of habeas data that people have in Colombia by constitutional provision. Similarly this policy is constructed as part of the implementation of the safety management system of corporate information in line with the program management personal data.

This policy is scoped to all databases containing personal data with treatment by Tenaris Tubo Caribe Ltda exercising its corporate purpose and as responsible.

Users of this policy are all employees of Tenaris Tubo Caribe Ltda, holders of personal data object treatment by Tenaris Tubo Caribe Ltda and all external stakeholders. this policy is considered a public document.

2. LEGAL FRAMEWORK

- Article 15 of the political constitution of Colombia
- Statutory law 1581 of 2012
- Regulatory decree 1377 of 2013
- Regulatory decree 886 of 2014
- Rules that modify, repeal or replace.

3. RESPONSIBLE DEPARTMENT

TENARIS TUBOCARIBE LTDA domiciled in the Industrial Park Carlos Velez Pombo Mm 1 vía Turbaco, Bolívar, Colombia.

mail society electronic tratamientodedatostubocaribe@tenaris.com and telephone (57-5) 6535400.

4. DEFINITIONS

- a. Authorization: previous consent, express and informed consent of the contractor to carry out the processing of personal data.

- b. Privacy notice: verbal or written communication generated by the charge, to the holder for the treatment of personal data by which you are informed about the existence of political information processing that will be applied, how to access to them and the purposes of processing which aims to give personal information.
- c. Database: organized set of personal data that is processed.
- d. Personal data: any information related or may be associated with one or more natural persons determined or determinable.
- e. Public information: the information other than semi-private, private or sensitive are considered public information, among other data concerning the civil status of persons, to their profession or trade and as a merchant or public servant. By its nature, public data can be contained, among others, in public records, public records, official gazettes and newsletters and duly executory judgments which are not subject to reservation.
- f. Sensitive data: sensitive data are defined as those that affect privacy holder whose misuse can lead to their discrimination, such as those revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, trade union membership, social organizations, human rights or promote interests of any political party or guarantee the rights and guarantees of opposition political parties, as well as data concerning health, sexual life, and biometric data.
- g. Data processor: natural or legal, public or private, which itself in association with others, perform the processing of personal data on behalf of the controller.
- h. Controller: natural or legal, public or private, which itself in association with others, decide on the database and / or treatment of the data.
- i. Title: natural person whose personal data are processed.
- j. Transfer: data transfer occurs when the manager and / or processor of personal data, located in Colombia, sends information or personal data to a

receiver, which in turn is responsible for treatment and is within outside the country.

- k. **Transmission:** processing of personal data that involves communicating them within or outside the territory of the republic of Colombia when intended to carry out a treatment by the manager on behalf of the principal.
- l. **Treatment:** any operation or set of operations on personal, such as collection, storage, use, movement or deletion data.

5. PRINCIPLES

- a. **Legality principle on data processing:** the treatment referred to in this law is a regulated activity that should be subject to the provisions therein and other provisions developing;
- b. **Principle of finality:** treatment must obey a legitimate purpose in accordance with the constitution and the law, which must be reported to the contractor;
- c. **Principle of freedom:** treatment may only be exercised with the consent prior, express and informed of the contractor. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or judicial order to relieve the consent;
- d. **Principle of accuracy or quality:** the information subject to treatment must be truthful, complete, accurate, current, verifiable and understandable. treatment of partial, incomplete, split or misleading data is prohibited;
- e. **Transparency principle:** in treatment the right of the holder must be guaranteed to obtain from the controller or processor, at any time and without limitation, information about the existence of data relating to him;
- f. **Principle of access and restricted circulation:** treatment is subject to limits deriving from the nature of personal data, the provisions of this policy, the legal framework on data protection and the constitution. in this regard, the treatment can only be done by authorized by the holder and / or person covered by this policy and legal framework on data protection people.

- g. Personal data, except public information may not be available on the internet or other mass media or mass, unless access is technically controllable to provide a limited knowledge only to holders or third parties authorized under this policy communication and legal framework for data protection;
- h. Security principle: the information subject to treatment by the controller or processor referred to this policy, should be handled with the technical, human and administrative measures necessary to provide security to the records avoiding adulteration, loss, consultation, use or unauthorized or fraudulent access;
- i. Principle of confidentiality: all persons involved in data processing personnel who do not have the nature of public are obliged to ensure the confidentiality of information, even after the end of his relationship with some of the works comprising treatment, can only perform supply or communication of personal data where this is in the development of authorized in this policy and legal framework on data protection activities.

6. AUTHORIZATION

Tenaris Tubo Caribe Ltda in compliance with the legal framework on data protection, will use mechanisms for authorization and prior informed consent of the processing of personal data in the database that apply to databases of existing personal data in the company.

Such authorization shall be informed clearly and expresses the holder, the treatment they will undergo their data, the Authorizational / facultative nature of the answers on sensitive, or data of children and adolescents data, his rights as a the information holder , identification, physical or electronic address. Overseeing his role as controller Tenaris Tubo Caribe Ltda shall keep proof of the authorization granted by the owners.

According to article 10 of law 1581 of 2012 cases in which authorization is not required are:

- a) Information required by a public or administrative entity in the exercise of using its legal functions or under a court order.
- b) Data of a public nature.
- c) Cases of medical or sanitary emergency
- d) Information processing authorized by law for historical purposes.
- e) Statistical or scientific.

- f) Data related to the civil registry of persons.

7. TREATMENT AND PURPOSE

Tenaris Tubo Caribe Ltda exercising its corporate purpose collects and treats personal data of employees, customers, suppliers, visitors to the administrative office and plant industrial, apprentices and candidates for employees, acting as responsible for this treatment.

The purpose for which collects and treats the various personal data is:

Database	Type of Information	End
Customers	Identification, location, social economic and sensitive data.	customers will be treated to the proper provision of products and services contracted Tenaris Tubo Caribe Ltda in compliance with its corporate purpose, using them to identify, contact, billing, collections and payments, contractual compliance, delivering products and services, customer service, quality assessments, delivery of market

		information, historical and statistical purposes and accounting management and financial, among others, in a business relationship.
Suppliers	Identification, location, social economic and sensitive data.	Personal data of the providers will be treated for the acquisition of inputs required for the exercise of the corporate purpose Tenaris Tubo Caribe Ltda, using them for contact identification, procurement of goods and services, collections and payments, accounting and financial management that applies to the client relationship supplier, historical, among others, in a business relationship.
Employees	Identification, location, social economic and sensitive data.	Personal data employees and its family will be addressed in compliance derived from the employment relationship, using them to identify,

		<p>contact, labor management, recruitment, collections and payments, compliance with para-fiscal, risk prevention, promotion of accounting and financial personnel and management that apply to the employment relationship between others within the employment relationship.</p>
<p>Visitors to the administrative office and industrial plant</p>	<p>Identification, location, biometric and sensitive data.</p>	<p>Personal data of visitors to the administrative and industrial plant of tenaris tubocaribe information can be treated for purposes of security and visitor control on the premises of the headquarters and compliance management system of safety and health at work, among others that may arise in relation to the physical security of the building and operation system safety management and occupational health.</p>

Apprentices	Identification, location, social economic and sensitive data.	Personal data learners are treated activities assigned by the sponsoring company fulfilling the duties agreed in the contract learning and being used for identification processes, share support, contact, billing, payment, risk prevention, and accounting and financial management among others.
Candidates employees	Identification, location, social-economic and sensitive data.	Personal data candidates will be treated exclusively for processes personnel selection and being used for identification, compensation, contact, recruitment, among others in the business relationship and candidates for employees.

8. DUTIES

Tenaris Tubo Caribe Ltda in their role as responsible for processing data from existing databases in the company, fulfill the following duties:

- a. Guarantee that the patentee, at all times, full and effective exercise of the right of habeas data.

- b. Order and maintain, as provided in this policy, a copy of the relevant authorization granted by the contractor.
- c. Duly inform the holder of the purpose of collection and his rights by virtue of the authorization granted.
- d. Keep information under security conditions necessary to prevent adulteration, loss, see, use or unauthorized or fraudulent access.
- e. Ensure that the information supplied the processor is truthful, complete, accurate, current, verifiable and understandable.
- f. Update information, communicating in a timely way the processor, all the news in the data previously supplied him and take other necessary so that the information provided this is kept current measures.
- g. Rectify incorrect information when relevant and communicate what the processor.
- h. Providing the processor, as appropriate, only data processed is previously authorized in accordance with the provisions of this policy.
- i. The processor demand at all times, respect the security and privacy of cardholder information.
- j. Handle inquiries and complaints made under the terms stated in this policy in compliance with the legal framework for the protection of personal data described in "legal framework" of this policy.
- k. Adopt an internal manual of policies and procedures to ensure proper compliance with this policy and legal framework on data protection and especially for answering inquiries and complaints.
- l. Inform the processor when certain information is under discussion by the contractor, once the claim has been submitted and has not completed the corresponding procedure.

- m. Inform request of the holder on the given data use.
- n. Inform the data protection authority when violations of safety codes and there are risks arise in the management of information card members.
- o. Comply with the instructions and requirements that imparts the superintendence of industry and commerce.

9. RIGHTS OF HOLDERS OF PERSONAL DATA

- a. Know, update and rectify any personal data which the controller is Tenaris Tubo Caribe Ltda. this right may be exercised, among others against partial, inaccurate, incomplete, split data, misleading, or those whose treatment is prohibited or not authorized;
- b. Request proof of the authorization granted to Tenaris Tubo Caribe Ltda unless expressly accepted as a requirement for the treatment, in accordance with provided for in article 10 of law 1581 of 2012 "cases where the authorization is not necessary.
- c. Shall be informed by Tenaris Tubo Caribe Ltda, upon request, regarding the use given to their personal data.
- d. Submit to the superintendence of industry and commerce complaints for violations of the provisions of the legal data protection framework described in chapter "2. legal framework "of this policy and all existing and future rules that modify, add or supplement;
- e. Revoke the authorization and / or request the deletion of data when the treatment not the principles, rights and constitutional and legal guarantees are respected. revocation and / or deletion proceed when the superintendence of industry and commerce has determine treatment in the controller or have engaged in conduct contrary to the law 1581 of 2012 and the constitution.

- f. For free access to their personal data have been processed.

10. RESPONSIBLE AREA

Tenaris Tubo Caribe Ltda arranges that the responsible department of processing requests, queries and complaints to which the holder of the information can exercise your right to know, update, rectify and delete the data and revoke the authorization, is the legal department.

To contact the responsible department the mailbox tratamientodedatostubocaribe@tenaris.com is arranged, as well as the address industrial park Carlos Vélez Pombo Km 1 Via Turbaco, Bolívar.

11. PROCEDURES

For purposes of address requests, inquiries and complaints that the holder may have about the processing of personal data and guarantee their rights to know, update, rectify and delete your personal data, Tenaris Tubo Caribe Ltda has provided the following:

- a. Care consultation: the holder may inquire referring to the processing of existing data in one of the databases handled by Tenaris Tubo Caribe Ltda. For this you must send a written request addressed to Tenaris Tubo Caribe Ltda some of the two channels arranged, email or physical address, as described in chapter "responsible area" of this policy.
The inquiry will be answered within a maximum term of ten (10) working days from the date of receipt thereof. when it is not possible to attend the consultation within that term, it will inform the person concerned, stating the reasons for the delay and indicating the date your inquiry will be addressed, which in no case exceed five (5) working days expiration of the first term.
- b. Care complaints: the holder who has a complaint regarding treatment of your data or to consider that data should be subject to correction, updating or deletion, or when the alleged failure to warn any of the duties of the laws referred to in article 2, may file a complaint or grievance.

Complaints and claims shall be made by application to Tenaris Tubo Caribe Ltda some of the two channels arranged, email or physical address, described in "responsible area" of this policy, identification headline, description of the facts giving rise to the claim, management, and accompanying documents want to enforce.

If the complaint is incomplete, the interested party will be required within five (5) business days after receipt of the complaint to rectify the faults. After two (2) months from the date of request, without the applicant presents the required information is deemed to have abandoned the claim.

Upon receipt of the completed claim, will be included in the database in the associated record holder is a legend that says "claim pending" and the reason thereof, within a period not exceeding two (2) business days. The legend should be maintained until the claim is decided.

The maximum term to address the claim will be fifteen (15) working days from the day following the date of its receipt. when it is not possible to meet the demand within that period, it shall inform the person concerned the reasons for the delay and the date your claim will be addressed, which in no case exceed eight (8) working days following the expiry of the first finished.

12. INFORMATION SECURITY

Tenaris Tubo Caribe Ltda abides by the principle of security in the processing of personal data will provide the technical, human and administrative measures necessary records provide security to prevent adulteration, loss, see, use or unauthorized or fraudulent access.

In that sense Tenaris Tubo Caribe Ltda has a set of security measures that protect your information and personal data, and cares constantly to maintain a low level of risk in information security. Thus Tenaris Tubo Caribe Ltda is committed to safeguard the confidentiality, integrity and confidentiality of their information assets and including the data and privacy of personal information. Despite the above, the information security is not absolute and in the unfortunate event of materializing a security incident, this will be an unfortunate action that does not compromise the due diligence of Tenaris Tubo Caribe Ltda in his actions in relation to security of the information.

13. EFFECTIVENESS

This policy of protection for personal data processing is approved and in force since may 10, 2017.