Translation provided for reference. The Spanish version is the official text and prevails in case of any discrepancy.

In compliance with Article 15 of the Political Constitution of Colombia, Statutory Law 1581 of 2012 and its Regulatory Decree 1377 of 2013 (compiled in Sole Regulatory Decree 1074 of 2015), **COTEL INVESTMENT S.A.S.**, the company that develops and operates the **UAI® Energy** platform (hereinafter "UAI" or "the Controller"), sets out the policy that applies to the processing and protection of the personal data it collects, stores, uses, circulates or deletes in the course of its activities, including the **uaienergy.com** website and the UAI SaaS platform —in its web version and its mobile app— with its Invoice Management, Smart Metering and Infrastructure Management modules and the UAI Expert analysis engine.

1. IDENTIFICATION OF THE CONTROLLER

Data Controller	COTEL INVESTMENT S.A.S.
Tax ID (NIT)	901.771.577-3
Brand and platform	UAI® Energy — operational intelligence platform · https://uaienergy.com
Address for notices	Cl. 42 Norte # 4N - 15, Cali, Valle del Cauca, Colombia
Email for requests, inquiries and complaints	jose.oyaga@uaienergy.com
Phone	+57 301 785 8644
Team that handles requests	UAI Support team
Scope of operation	Colombia
Economic activity (CIIU code)	7112 — Engineering activities and related technical consultancy 4652 — Wholesale of electronic and telecommunications equipment and parts 7490 — Other professional, scientific and technical activities n.e.c.

2. SCOPE AND ROLE OF UAI REGARDING THE DATA

This policy applies to all databases and files containing personal data processed by UAI, and is binding on the Controller, its employees, contractors and any third parties acting on its behalf. Depending on where the information comes from, UAI acts in one of the following roles:

2.1. As Data Controller

When it decides on the purpose and use of the data. This is the case for the data of employees, job applicants, customers, suppliers, business contacts and prospects who reach us through the uaienergy.com website or WhatsApp, and of the users for whom access accounts to the Platform are created.

2.2. As Data Processor

When it processes personal data on behalf of its business customers, who are the Controllers of that information. This is the case for any personal data that may be contained in the utility bills and collection statements that the customer forwards to or uploads onto the Platform, and for the contact details of the people the customer designates to receive alerts and notifications or to act as contacts at its sites. In these cases UAI processes the data solely to provide the contracted service, following the customer's instructions and what has been agreed with it. As Controller, the customer is responsible for obtaining the authorization of the data subjects and for addressing their rights, with UAI's cooperation.

2.3. Technical information on equipment and sites

Equipment telemetry (UPS units, precision cooling, generators, electricity meters and process variables), technical data sheets, maintenance records and the operating signals of the sites —such as occupancy counts or whether a room is booked— are, as a general rule, technical information and not personal data: the Platform does not receive the identity of the people who occupy or book the spaces. If such information were ever linked to an identified or identifiable natural person, this policy would apply to it.

3. LEGAL FRAMEWORK

- Political Constitution of Colombia, Articles 15 and 20.
- Statutory Law 1266 of 2008 and its Regulatory Decrees 1727 of 2009 and 2952 of 2010.
- Statutory Law 1581 of 2012.
- Decree 1377 of 2013 and Decree 886 of 2014, compiled in Sole Regulatory Decree 1074 of 2015 (Commerce, Industry and Tourism Sector), and Decree 090 of 2018.
- Single Circular (Circular Única) of the Superintendence of Industry and Commerce (SIC), Title V, and any other rules that amend, add to or complement the above.
- Judgment C-748 of 2011 of the Constitutional Court.

4. DEFINITIONS

AUTHORIZATION: the prior, express and informed consent of the data subject to the processing of their personal data.

PRIVACY NOTICE: a verbal or written communication issued by the controller to the data subject, informing them of the existence of the processing policies that will apply to them, how to access them and the purposes of the processing.

DATABASE: an organized set of personal data that is subject to processing.

SUCCESSOR IN TITLE (CAUSAHABIENTE): a person who has succeeded another upon that person's death (heir).

CUSTOMER: a legal entity or natural person that contracts one or more modules of the UAI Platform or UAI services.

PERSONAL DATA: any information linked to, or that can be associated with, one or more identified or identifiable natural persons.

PUBLIC DATA: data that is not semi-private, private or sensitive. Public data includes, among others, data relating to a person's marital status, profession or trade, and status as a merchant or public servant.

SENSITIVE DATA: data that affects the data subject's privacy or whose misuse could lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership of trade unions or social or human rights organizations, as well as data relating to health, sex life and biometric data.

ESSENTIAL DATA: personal data that is indispensable for carrying out the company's business activity and that must be provided by the data subjects or by those entitled to exercise their rights.

DATA PROCESSOR (ENCARGADO DEL TRATAMIENTO): a natural or legal person, public or private, that by itself or together with others processes personal data on behalf of the Controller.

HABEAS DATA: the right of every person to know, update and rectify the information collected about them in databases and files of public and private entities.

SECURITY INCIDENT: a breach of security codes, or the loss, theft or unauthorized access to information in a database managed by the Controller or the Processor.

UAI PLATFORM: the multi-tenant SaaS solution operated by Cotel Investment S.A.S. under the UAI® Energy brand, available as a web version and a mobile app, made up of the Invoice Management, Smart Metering and Infrastructure Management modules and the UAI Expert artificial intelligence engine.

DATA CONTROLLER (RESPONSABLE DEL TRATAMIENTO): a natural or legal person, public or private, that by itself or together with others decides on the database and/or the processing of the data.

DATA SUBJECT (TITULAR): the natural person whose personal data is processed.

PROCESSING: any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

TRANSFER: the sending of personal data by a controller and/or processor located in Colombia to a recipient that is itself a data controller, inside or outside the country.

TRANSMISSION: the communication of personal data inside or outside Colombian territory for the purpose of processing by the processor on behalf of the controller.

USER: a natural person who is assigned an access account to the UAI Platform.

5. PRINCIPLES

In the development, interpretation and application of Law 1581 of 2012 and the rules that complement, amend or add to it, the following guiding principles shall be applied in a harmonious and comprehensive manner:

a) **Legality:** data processing is a regulated activity that must comply with the law and the provisions that implement it.

b) **Purpose:** processing must serve a legitimate purpose in accordance with the Constitution and the law, which must be disclosed to the data subject. UAI will only collect data that is relevant and adequate for the purpose for which it was collected or requested.

c) **Freedom:** processing 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 prior authorization, or in the absence of a legal or judicial mandate that waives consent.

d) **Accuracy or quality:** the information processed must be truthful, complete, accurate, up to date, verifiable and understandable. The processing of partial, incomplete, fragmented or misleading data is prohibited.

e) **Transparency:** the data subject's right to obtain from the controller or processor, at any time and without restriction, information about the existence of data concerning them is guaranteed.

f) **Restricted access and circulation:** processing may only be carried out by persons authorized by the data subject and/or by the persons provided for by law. Personal data, except public information, may not be made available on the internet or other mass media unless access is technically controllable to provide restricted knowledge only to data subjects or authorized third parties.

g) **Security:** the information processed will be handled with the technical, human and administrative measures necessary to keep records secure, preventing their alteration, loss, consultation, use or unauthorized or fraudulent access.

h) **Confidentiality:** UAI guarantees the confidentiality of the information, even after its relationship with any of the tasks involved in the processing has ended, and will only supply or communicate personal data when this corresponds to the activities authorized by law.

6. PERSONAL DATA PROCESSED AND ITS ORIGIN

Group of data subjects	Data processed	Origin / channel
Business contacts and prospects (Controller)	Full name, company, business email, country, city, phone number (optional), service of interest and any information the data subject chooses to include in their message.	The virtual assistant on uaienergy.com, which stores the request in UAI's database and sends an email notice to the sales team and a confirmation to the data subject; WhatsApp; email, phone calls, events and business meetings.
Platform users (Controller)	Name, email, organization, assigned sites and role or profile, language, access credentials (the password is never stored in readable form) and, if the user enables it, the setup of their one-time code (OTP). Traceability records: date, time and IP address of each sign-in, screens viewed, and the date and time on which they accepted this policy.	The customer's request when activating the service, and use of the Platform.
People included in bills and collection statements (Processor)	Name or company name of the account holder, identification number, property address, account or contract number, consumption and amounts billed.	Automatic forwarding from the utility provider or upload by the customer.
Contacts designated by the customer (Processor)	Name and contact details of the people who receive the service's alerts, reports and notifications, or who act as contacts at the sites.	Registered by the customer.
Customers and suppliers (Controller)	Contact details of representatives and liaison persons, tax data and the banking data needed for invoicing and payments.	Contractual and business relationship.
Employees, job applicants and contractors (Controller)	Identification, contact, education, experience, social security and payroll data, and any other data required for the employment or contractual relationship.	Recruitment and hiring processes.

Website and cookies. The uaienergy.com website uses Google Analytics analytics cookies to understand how it is used and improve it, only if the visitor accepts them in the cookie notice; until they do, the analytics tool is not loaded. The website does not use advertising cookies. The visitor's choice is stored in their browser and can be changed by clearing the site's data. In addition, the virtual assistant uses Google's reCAPTCHA service to check that whoever submits a request is a person; this service is loaded only at that step.

7. PROCESSING AND PURPOSES

The processing of the essential personal data of employees, customers, suppliers and users will be framed within the legal order and the business activity carried out by the Controller. Personal data will be processed for the following purposes:

7.1. Business contacts and prospects

a) Responding to requests received through the website's virtual assistant, WhatsApp and UAI's sales channels.

b) Scheduling and delivering Platform demos, energy assessments and technical visits.

c) Preparing and sending commercial proposals and following up on them.

d) Sending information about UAI's products, services, events and news, only to those who have expressly authorized it. The data subject may ask at any time to stop receiving these communications.

7.2. Platform users

a) Creating, managing, suspending and deleting access accounts.

b) Authenticating the user, including the one-time code (OTP) generated with an authenticator app when the user enables it, and controlling their permissions according to the assigned role.

c) Keeping a record of access and actions for security, audit and fraud-prevention purposes.

d) Sending alerts, alarms, management reports and service notifications.

e) Providing technical support and handling requests.

7.3. Data processed on behalf of customers (as Processor)

a) Processing bills and collection statements, producing analyses by site, heat maps, files for the customer's ERP and reports, and supporting claims filed with the utility providers.

b) Correlating occupancy, weather and room bookings with energy consumption, and carrying out the cooling-control actions expressly enabled by the customer.

c) Sending alerts, reports and notifications to the contacts designated by the customer.

d) UAI will not use this data for its own purposes other than providing the contracted service.

7.4. Customers, suppliers and employees

a) Keeping the data subject informed of the status of invoices and of everything related to the commercial purposes of the transactions carried out.

b) Using and storing the data in UAI's databases.

c) Complying with contractual, accounting, tax and legal obligations.

d) In general, carrying out the activities inherent to the business in accordance with Colombian commercial law.

7.5. Service improvement

Producing statistics and indicators on the use and performance of the Platform, using aggregated or anonymized information that does not allow data subjects to be identified.

8. USE OF ARTIFICIAL INTELLIGENCE (UAI EXPERT)

UAI Expert is the Platform's artificial intelligence engine. It mainly processes technical information: equipment telemetry, technical data sheets, maintenance records and consumption data, in order to deliver diagnoses, failure projections, recommendations and narrative reports by site. With regard to personal data, UAI undertakes to:

a) Not use UAI Expert to profile natural persons or to make automated decisions that produce legal effects on data subjects or significantly affect them.

b) Minimize the personal data included in analysis processes, and use aggregated or anonymized data whenever possible.

c) Not use customers' personal data to train third-party artificial intelligence models, nor share it with third parties for that purpose.

d) Maintain human oversight of the recommendations generated by the system.

9. SENSITIVE DATA

UAI will only process sensitive data when:

a) The data subject has given their explicit authorization, except where such authorization is not required by law.

b) The processing is necessary to protect the vital interest of the data subject and they are physically or legally incapacitated. In such cases, their legal representatives must grant the authorization.

c) The processing is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other non-profit body whose purpose is political, philosophical, religious or trade-union related, provided that it refers exclusively to its members or to persons who maintain regular contact with it because of its purpose. In such cases, the data may not be supplied to third parties without the data subject's authorization.

d) The processing relates to data necessary for the recognition, exercise or defense of a right in legal proceedings.

e) The processing has a historical, statistical or scientific purpose. In this case, measures must be taken to remove the identity of the data subjects.

When sensitive data is requested, the data subject will be informed that they are not obliged to provide it and which of the requested data is sensitive.

The UAI mobile app lets users sign in with the fingerprint or face registered on their phone. That verification is performed by the device's operating system: UAI does not receive, store or process biometric data.

10. RIGHTS OF CHILDREN AND ADOLESCENTS

The UAI Platform and the uaienergy.com website are intended for businesses and professionals, not for minors. Processing will ensure respect for the prevailing rights of children and adolescents. The processing of their personal data is prohibited, except for data of a public nature and provided that such processing: (a) responds to and respects their best interests, and (b) ensures respect for their fundamental rights. Once these requirements are met, the legal representative will grant the authorization, after the minor has exercised their right to be heard, an opinion that will be assessed taking into account their maturity, autonomy and ability to understand the matter.

11. RIGHTS OF THE DATA SUBJECT

The data subject has the following rights:

a) To know, update and rectify their personal data held by UAI as data controller. This right may be exercised, among others, regarding partial, inaccurate, incomplete, fragmented or misleading data, or data whose processing is expressly prohibited or has not been authorized.

b) To request proof of the authorization granted, except where it is expressly exempted as a requirement for processing.

c) To be informed, upon request, of the use that has been made of their personal data.

d) To file complaints with the Superintendence of Industry and Commerce for breaches of Law 1581 of 2012, once the inquiry or complaint procedure before UAI has been exhausted.

e) To revoke the authorization and/or request the deletion of the data when the processing does not respect constitutional and legal principles, rights and guarantees.

f) To access, free of charge, their personal data that has been processed.

12. DUTIES OF UAI

12.1. As Data Controller

a) To guarantee the data subject, at all times, the full and effective exercise of the right of habeas data.

b) To request and keep a copy of the authorization granted by the data subject.

c) To duly inform the data subject of the purpose of the collection and of the rights they have by virtue of the authorization granted.

d) To keep the information under the security conditions necessary to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access.

e) To ensure that the information is truthful, complete, accurate, up to date, verifiable and understandable.

f) To update the information, taking into account all changes regarding the data subject's data, and to implement the measures necessary to keep it up to date.

g) To rectify the information when it is incorrect and communicate the relevant changes.

h) To respect the security and privacy conditions of the data subject's information.

i) To handle inquiries and complaints in the terms established by law.

j) To identify when certain information is being disputed by the data subject.

k) To inform the data subject, upon request, of the use made of their data.

l) To inform the Superintendence of Industry and Commerce of any breach of security codes that poses risks to the management of data subjects' information.

m) To comply with the requirements and instructions issued by the Superintendence of Industry and Commerce.

n) To use only data whose processing has been previously authorized in accordance with Law 1581 of 2012.

o) To require the Processors it hires to respect the security and privacy conditions of the data subject's information.

p) To use personal data only for the purposes for which it is duly empowered, in all cases respecting the regulations in force.

12.2. As Data Processor

a) To process the data solely in accordance with the instructions of the customer acting as Controller and with the terms of the contract.

b) To keep the information under security conditions that prevent its alteration, loss, consultation, use or unauthorized or fraudulent access, and to guarantee the separation of the information of different customers.

c) To support the customer in handling data subjects' inquiries and complaints, and to forward to the customer any it receives directly, within a maximum of two (2) business days.

d) To inform the customer, without undue delay, of any security incident affecting its data.

e) To return or delete the customer's data at the end of the contractual relationship, under the agreed terms, unless there is a legal obligation to keep it.

13. AUTHORIZATION AND CONSENT OF THE DATA SUBJECT

Without prejudice to the exceptions provided for by law, the processing of personal data requires the prior, express and informed authorization of the data subject, obtained by any means that can be consulted later. UAI will obtain authorization through the following means:

a) uaienergy.com website: before storing a request, the virtual assistant asks the data subject to expressly authorize the processing of their data so that we can reply. If they do not grant it, their data is not stored.

b) UAI Platform: the first time the user signs in, the Platform shows them a summary of this policy, with a link to the full text, and asks them to accept it. Without that acceptance they cannot use the Platform. The acceptance is recorded in their account with the date and time.

c) In writing, in physical or digital form: for employees, job applicants, suppliers and customers, when the relationship with the company begins.

d) Unequivocal conduct: conduct from which it can reasonably be concluded that the data subject granted authorization, such as voluntarily sending their data for a previously disclosed purpose.

Under no circumstances will the data subject's silence be taken as unequivocal conduct or as authorization to process their personal data. Data subjects may exercise their rights regarding the processing of their data by email at jose.oyaga@uaienergy.com, by phone at +57 301 785 8644, or in person (on paper) at the address for notices.

13.1. Cases in which authorization is not required

a) Information requested by a public or administrative entity in the exercise of its legal functions or by court order.

b) Data of a public nature.

c) Medical or health emergencies.

d) Processing of information authorized by law for historical, statistical or scientific purposes.

e) Data relating to people's Civil Registry.

14. PRIVACY NOTICE

When it is not possible to make this policy available to the data subject at the time of collection, UAI will inform them through a privacy notice of the identity of the controller, the processing and purpose of their data, the rights they have and the means of accessing this policy, which will be permanently published on the uaienergy.com website.

15. WHO MAY EXERCISE THE DATA SUBJECT'S RIGHTS

The rights of data subjects may be exercised by the following persons:

a) The data subject, who must sufficiently prove their identity by the various means made available by UAI.

b) The data subject's successors in title, who must prove that status.

c) The data subject's representative and/or attorney-in-fact, upon proof of the representation or power of attorney.

d) By stipulation in favor of or for another person.

The rights of children and adolescents will be exercised by the persons authorized to represent them.

16. TRANSMISSION, TRANSFER AND PERSONS TO WHOM THE INFORMATION MAY BE SUPPLIED

Information that meets the conditions established by law may be supplied to:

a) The data subjects, their successors in title (in their absence) or their legal representatives.

b) Public or administrative entities in the exercise of their legal functions or by court order.

c) Third parties authorized by the data subject or by law.

d) The technology providers that act as UAI's Processors to operate the Platform and the website: Google, for cloud infrastructure and storage (Google Cloud), email, website analytics (Google Analytics) and reCAPTCHA verification; Meta, for conversations the data subject starts via WhatsApp; and the cellular (4G) connectivity operator for the metering gateways.

The Platform, its database and the associated files are hosted on Google Cloud, in data centers located in the United States of America, so personal data is transmitted to that country. UAI will only transmit or transfer data to countries that offer an adequate level of protection according to the criteria of the Superintendence of Industry and Commerce, or under data transmission agreements or other safeguards that ensure compliance with this policy and with Colombian law. UAI does not sell or trade personal data.

17. INFORMATION SECURITY MEASURES

In accordance with the security principle, UAI applies, among others, the following technical, human and administrative measures on the UAI Platform:

a) Multi-tenant architecture with information separated by organization: each user sees only the data of their organization and of the sites assigned to them.

b) Centralized authentication with Keycloak, one-time codes (OTP) via an authenticator app, role-based access control and access traceability.

c) Encryption of communications over HTTPS with TLS 1.2 or higher, with outbound-only traffic from the sites and no inbound ports opened from the internet.

d) Principle of least privilege: data acquisition works in read-only mode, with read-only credentials for each device. Control actions are enabled explicitly and in a limited way, with traceability of every change.

e) Metering gateways with 4G connectivity independent of the customer's internal network.

f) Confidentiality agreements with employees and contractors, and access to information restricted to those who need it for their duties.

Incident management. In the event of a security incident compromising personal data, UAI will immediately take measures to contain it, will inform the affected customers and data subjects where appropriate, and will report it to the Superintendence of Industry and Commerce within fifteen (15) business days of its detection, in accordance with that entity's Single Circular.

18. DATA RETENTION PERIOD

- **Business contacts and prospects:** for up to two (2) years from the last interaction, unless a contractual relationship begins or the data subject requests earlier deletion.
- **Platform users:** while the account is active and the contract with the customer is in force. Traceability records will be kept for as long as necessary for security and audit purposes.
- **Data processed on behalf of customers:** for the term of the contract and, upon its termination, it will be returned or deleted under the agreed terms.
- **Accounting and tax information:** for the periods required by law.

Once the purpose and the above periods have been fulfilled, the data will be securely deleted or anonymized.

19. RESPONSIBLE FOR HANDLING REQUESTS, INQUIRIES AND COMPLAINTS

Cotel Investment S.A.S., through the UAI Support team, oversees compliance with this policy and handles data subjects' requests, inquiries and complaints, as well as any request to update, rectify or delete personal data, by email at jose.oyaga@uaienergy.com or by phone at +57 301 785 8644.

All data protection requests received through other UAI channels will be forwarded to that email address within a maximum of two (2) business days, and response times will be counted from the date they were first received.

20. PROCEDURE FOR HANDLING INQUIRIES, COMPLAINTS AND REQUESTS

a) Inquiries

Data subjects or their successors in title may consult the data subject's personal information held by UAI, which will provide all the information contained in the individual record or linked to the data subject's identification. Inquiries must be sent to jose.oyaga@uaienergy.com and will be answered within a maximum of ten (10) business days from the date of receipt. When it is not possible to answer within that period, the person concerned will be informed of the reasons for the delay and of the date on which their inquiry will be answered, which may in no case exceed five (5) business days after the first period expires.

b) Complaints

Data subjects who consider that the information contained in a database should be corrected, updated or deleted, or who notice an alleged breach of any of the duties set out in the law, may file a complaint with UAI, which will be handled according to the following rules:

- The complaint must be sent to jose.oyaga@uaienergy.com, with the data subject's identification, a description of the facts giving rise to the complaint, their address, and any supporting documents. If the complaint is incomplete, the person concerned will be asked within five (5) days of receipt to correct the shortcomings. If two (2) months pass from the date of that request without the applicant providing the required information, they will be deemed to have withdrawn the complaint.
- If whoever receives the complaint is not competent to resolve it, they will forward it to the appropriate party within a maximum of two (2) business days and inform the person concerned.
- Once the complete complaint has been received, the legend "complaint in process" and its reason will be added to the database within no more than two (2) business days. That legend will remain until the complaint has been resolved.
- The maximum period for addressing the complaint will be fifteen (15) business days from the day after its receipt. When it is not possible to address it within that period, the person concerned will be informed of the reasons for the delay and of the date on which it will be addressed, which may in no case exceed eight (8) business days after the first period expires.

c) Requests to update, rectify and delete data

UAI will rectify and update, at the data subject's request, any information that is incomplete or inaccurate, following the procedure and time limits set out above. To do so, the data subject must send their request to jose.oyaga@uaienergy.com, stating the update, rectification or deletion required and providing the supporting documents.

d) Revocation of authorization and/or deletion of data

Data subjects may revoke their consent to the processing of their personal data at any time, provided that no legal or contractual provision prevents it, by writing to jose.oyaga@uaienergy.com. If UAI has not deleted the personal data once the legal period has expired, the data subject will be entitled to ask the Superintendence of Industry and Commerce to order the revocation of the authorization and/or the deletion of the data, following the procedure described in Article 22 of Law 1581 of 2012.

When the request concerns data that UAI processes as Processor on behalf of a customer, UAI will forward it to that customer within a maximum of two (2) business days, inform the data subject accordingly and support the customer in its response.

21. NATIONAL DATABASE REGISTRY (RNBD)

The National Database Registry is the public directory of the databases subject to processing that operate in the country, managed by the Superintendence of Industry and Commerce and freely accessible to citizens. Under Sole Regulatory Decree 1074 of 2015, as amended by Decree 090 of 2018, companies and non-profit entities whose total assets exceed one hundred thousand (100,000) Tax Value Units (UVT) must register their databases. Cotel Investment S.A.S. will register its databases in the RNBD and keep its information up to date when it is required to do so, within the terms and deadlines established by the regulations in force and the instructions of the Superintendence of Industry and Commerce.

22. EFFECTIVE DATE AND AMENDMENTS

This policy is effective from October 14, 2026 and supersedes all previous versions. The databases will be kept for as long as the purposes described and the periods in section 18 remain in place. Any substantial change will be communicated to data subjects in due time through the uaienergy.com website or by email, before it comes into force.

23. DOCUMENT CHANGE LOG

Ver.	Change	Date	Responsible
1	Creation of the UAI® Energy Personal Data Processing and Protection Policy: identification of the controller, scope and roles as Controller and Processor, data processed and its origin, purposes by module, use of artificial intelligence, sensitive data, rights and duties, authorization, transmissions and transfers, security measures, retention periods, inquiry and complaint procedure, RNBD and effective date.	September 22, 2026	José Luis Oyaga — Data Controller
2	The Data Controller becomes Cotel Investment S.A.S. The data processed and its origin, the purposes, the use of cookies, authentication, authorization, providers and the hosting location of the data are aligned with how the website and the Platform currently operate. Acceptance of the policy on first sign-in to the Platform is added. The scope of operation, the economic activity and the RNBD section are updated.	October 14, 2026	Nicolle Quijano Zuluaga — Legal Representative, Cotel Investment S.A.S.