VIAJEROS CON SABOR

PRIVATE TOURS · MEDELLÍN AND ANTIOQUIA

DATA PROCESSING POLICY

Privacy and personal data

The information we use, how we retain it and how you can exercise your rights.

IN THIS DOCUMENT

Data and consent 02-03

Access and digital tools 04

Offers and retention 05

Rights and information protection 06-07

REAL ESTATE CAPITAL COLOMBIA SAS

NIT 901630707-1 · RNT 204034 · Tour operating agency

REVISION 03 · 17 SEPTEMBER 2026 · REVIEW DRAFT

CONTROLLER AND INFORMATION

01 Data controller and scope

Viajeros con Sabor is a commercial brand operated by **REAL ESTATE CAPITAL COLOMBIA SAS**, Colombian tax identification number **901630707-1**, domiciled in Medellín, Colombia. This company is the data controller responsible for deciding the purposes and processing described in this policy.

This policy explains the information we process to quote, book and provide our private tours, respond to requests and meet legal obligations. It covers information received through our customer service channels and, when enabled, the website booking and payment functions.

Personal data contact: the person designated by the company coordinates requests, consent records, access and deletion. Email: **concierge@realestatecol.com.co**. Telephone and WhatsApp: **+57 302 2198159**. Address: **Cl. 26, Av. Las Palmas #38-26, Edificio BIO26, Medellín, Colombia**.

02 Information we use

We collect only information relevant to a disclosed purpose. Processing includes receiving, organizing, storing, consulting, using, sharing where authorized and deleting that information.

Bookings and customer service: the booking contact's identity and contact details, experience, date, number and ages of travelers, pickup and drop-off points, and communications needed to arrange the service or handle requests.

Medical assistance: each participant's first name, last name, email address and identity document or passport number to issue their assistance card through Colasistencia. We do not request a photograph of the document for this purpose.

Invoicing and payments: identification and invoicing details, transaction references and status, and relevant tax records. Evidence for a potential exemption is handled outside the online purchase. A copy of an identity document is not a routine requirement for issuing an invoice; foreign nationality alone does not establish entitlement to an exemption.

Health or mobility needs, permission to receive offers and images are handled under the specific sections of this policy.

03 Consent and group bookings

Before collecting data, we will explain its purpose, identify the controller and provide channels for exercising your rights. We will request consent where required and retain evidence allowing the information provided and the response to be consulted later. Reading this policy, remaining silent or paying for a booking does not in itself grant every permission.

For group bookings, the written request is addressed to **the person making the booking and coordinating the group**. This person will collect and forward each adult's written consent together with their data. WhatsApp replies to the text provided by VCS may be used, without an additional form or individual link.

The evidence must identify the adult giving consent and the scope of their decision. The coordinator forwards the permissions; their own acceptance does not replace that of their companions. Only the necessary part of the communication will be retained.

Permission to arrange the tour does not automatically include marketing, use of images or sensitive information. Where a law allows processing without consent, we will restrict that use to the purpose and conditions of the applicable exception.

04 Sensitive information and children

Allergies, dietary restrictions or mobility needs may reveal health information. Providing it is voluntary. Where it constitutes sensitive data, we will explain the purpose and request explicit consent for VCS to handle it. We do not generally require complete medical records or use this information for marketing.

No activity will be conditional on consenting to the processing of sensitive data. We may explain the features and demands of the experience and the available alternatives, while respecting the traveler's decision not to provide that information.

Children's data will be processed only where appropriate for their participation, safety and assistance, respecting their best interests and rights. We will explain that answering questions about their data is optional and identify the arrangements that require information to be carried out.

Consent must come from the legal representative and take the child's views into account according to their maturity. Traveling with an authorized adult does not make that companion a legal representative. **We will not use images of identifiable children on social media or in advertising**, including group photographs.

05 Access to data and recipients

The internal customer service team accesses the customer service WhatsApp account to handle requests and bookings. Their contracts include confidentiality commitments. Access must be limited to the information each person needs for their duties.

Activity providers: reservations are made in the company's name, and customer data is not supplied to them.

Colasistencia: receives the first names, last names, email addresses and identity document or passport numbers needed to issue assistance cards. This disclosure has a specific purpose and does not authorize marketing use.

Drive archive: the accountant will have access only to accounting and tax records. Customer consents and complaints will be accessible exclusively to the person designated by VCS for data protection. This archive rule is separate from the team's access to the customer service channel.

We will also respond to requests from competent authorities where there is a legal basis. Disclosure will be limited to the information relevant to the request.

06 Digital tools and payments

We use WhatsApp to handle enquiries and bookings, and Google Drive to retain necessary documents. These technology services are separate from tourism activity providers; their operators process information according to their roles and privacy terms.

When payment through **Bold** is enabled, we will share the name, email address, telephone number and order details necessary to process it. Payment method details are entered in the payment gateway. VCS uses the transaction reference and status to manage and confirm the booking.

The website uses Google resources to display fonts and review photographs. When these resources are requested, the provider may receive technical connection information. This does not, in itself, constitute use of Google Analytics.

Google Analytics, if enabled, will require the relevant consent and will be limited to understanding visits, traffic sources and use of booking features, without remarketing. We will not send names, identity documents, contact details or health information in analytics events.

Where these services involve processing outside Colombia, we will limit the information to the stated purpose and apply the required legal and contractual safeguards. This does not authorise indiscriminate use of personal data. Our Cookie Policy explains cookie purposes and available choices.

07 Offers and images of adults

Offers by email or WhatsApp will require optional permission for communications from **Viajeros con Sabor**. Accepting a booking does not authorize campaigns from other Real Group brands. Declining or withdrawing this permission does not prevent you from receiving the booked service or the communications needed to provide it.

To publish photographs or videos of identifiable adults on social media or in advertising, we will request specific consent from each person, identifying the uses and media involved. The person making the booking cannot, merely by booking, grant rights to use their companions' images.

You may ask us to stop marketing or remove images through our customer service channels. We will handle removal of content under VCS control and take the appropriate steps with third parties. Permission will not be a perpetual, irrevocable assignment or a condition of participating in the tour.

08 Retention and deletion

We will delete customer-service conversations on **31 December each year**, first saving only necessary supporting records in Drive. We will not routinely archive entire chats.

Information	Retention
Commercial and accounting books and supporting records	Ten years from the last entry, document or voucher, under Article 28 of Law 962 of 2005, subject to any applicable special obligation.
Bookings and complaints	Until handled and the applicable statutory retention or liability periods for the record have elapsed.
Consent records	During processing and for the period needed to establish its lawfulness or handle a claim.
Health and mobility	Until the activity and any related incident are concluded, unless a specific record must be retained by law.
Offers and images	While consent remains valid and the stated purpose continues; after withdrawal, use stops and only necessary evidence of its handling is kept.

Once the purpose is fulfilled and the applicable period expires, we will delete or anonymise the information. A claim or an authority order may require retaining its supporting records until resolved. Annual deletion does not postpone valid erasure requests.

Deletion covers files, downloads and copies under VCS control. Deleting a chat does not automatically erase backups or records subject to third parties' own obligations.

09 Your data protection rights

You may access and consult your data, request updates or corrections, ask for evidence of consent and learn how we have used your information. You may also request deletion or withdraw permission where applicable, and access your information free of charge under the legal conditions.

If a record must be retained under a legal or contractual obligation, we will explain the reason and scope of retention in our response. Retention does not permit other purposes, such as continuing to send marketing after permission has been withdrawn.

You may act directly or through a representative who provides evidence of that authority. Identity verification will be proportionate to the request and will not automatically require a photograph of an identity document.

If you believe your rights have been infringed, you may contact Colombia's **Superintendencia de Industria y Comercio**, after first completing the relevant inquiry or complaint procedure with the controller or processor.

10 Requests and response times

Write to **concierge@realestatecol.com.co** or WhatsApp **+57 302 2198159**, providing your name, request, a reply channel and, where relevant, proof of representation or supporting records. Requests will be directed to the person designated by VCS for data protection. You do not need to purchase a service to exercise these rights. We will acknowledge receipt and provide a reference for status inquiries through these channels, without requiring a new request for follow-up.

Inquiries: a response within **10 business days** of receipt. If we cannot respond within that period, we will explain the reasons and provide a new date in time, with an extension of no more than **5 business days** after the original deadline.

Complaints: a response within **15 business days**, counted from the day after receipt. Any justified extension will be notified before that deadline and will not exceed **8 additional business days**.

If a complaint is incomplete, we will request the missing information within **5 days** of receipt. If **2 months** pass after that request without receiving the information, the complaint will be treated as withdrawn. If we are not competent to handle it, we will forward it within **2 business days** and notify the person concerned.

Once a complete complaint is received, we will mark the record as subject to a pending complaint, together with its reason, within **2 business days** and retain the annotation until the complaint is resolved.

11 Security and confidentiality

The company must apply access controls according to duties, confidentiality obligations and technical and administrative measures proportionate to the data it handles. Identity documents and tax records will not be used for campaigns or made publicly available.

Storage, access and deletion must respect the restrictions in this policy, including on devices and copies under VCS control. These measures do not relieve the company of its duties to handle incidents or make any notifications required by law.

If you notice unauthorized access, loss or misdirected information, contact **concierge@realestatecol.com.co** or **+57 302 2198159** so it can be assessed. Do not send passwords or full payment card details through these channels.

12 Effective date and policy changes

Revision 03 dated 17 September 2026, prepared for approval and publication. This policy will take effect when adopted and published by VCS; the revision date identifies this edition.

Databases and files will be retained according to the purposes and periods in section 8. Personal data will not be kept indefinitely merely because a service was provided.

Material changes will be communicated before implementation. Where a new purpose requires consent, we will request it. This policy is governed by Colombian law and will be available before personal data is collected.

LEGAL REFERENCES

Law 1581 of 2012 · Personal data protection

Decree 1074 of 2015 · Consent and retention

Decree 1074 of 2015 · Access and accountability

Law 962 of 2005 · Article 28