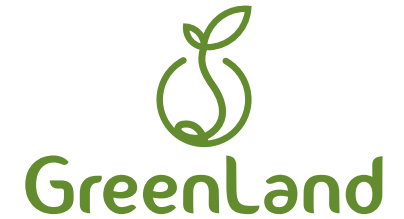


GENERAL PERSONAL DATA PROTECTION POLICY



GENERAL PERSONAL DATA PROTECTION POLICY

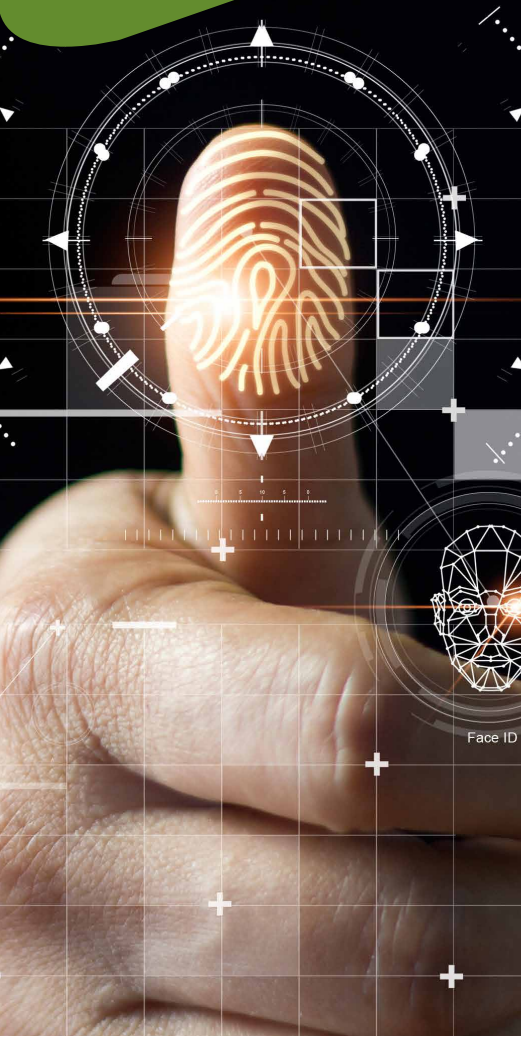
1 PURPOSE:

In this Policy, "Grupo GreenLand Investments S.A.S." guarantees the proper protection of data of employees, clients, vendors, producers, partners, service providers, collaborators and communities that benefit from social outreach programs, among others. This includes the rights which the owners of the information are entitled to.

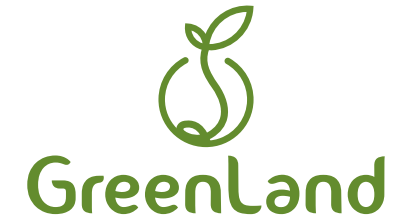
2 SCOPE:

The scope of this Policy involves every Company related to GreenLand Investments S.A.S. (hereinafter, "Grupo Empresarial GreenLand") which collect, process, update, consult, store, transfer and report personal data of employees, clients, vendors, producers, partners, service providers, among others – within the normal operation of their activities or duties. The purposes of this policy, the scope involves the companies listed below, included in the concept of Grupo GreenLand:

No	Razón Social	Nit
1	Agregados Caracolí de Urabá S.A.S	901.167.310-4
2	Agrícola el Carmen S.A.S.	890.940.677-8
3	Agrícola el Retiro S.A.S.	800.059.030-8
4	Agriplast S.A.S	901.263.353-1
5	Banalogistic S.A.	890.926.162-9
6	C.I. Banacol S.A.	890.926.766-7
7	Centurión S.A.S.	800.073.573-3
8	CFS Logistics LLC	860.008.820-1



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No	Razón Social	Nit
9	Compañía De Aspersiones Aéreas Control B S.A.S. Zomac	901.390.136-3
10	El Convite S.A.S.	800.073.563-1
11	Entre Arroyos S.A.S.	900.650.395-7
12	Exportadora De Banano S.A.S	860.070.512-9
13	FGL Fundación GreenLand	800.023.087-1
14	Fondo De Empleados Greenland	900.103.234-4
15	Frubatec S.A.S Zomac	901.263.414-2
16	GreenLand Investments S.A.S.	901.350.682-2
17	Naturehealth S.A.S	901.337.671-8
18	Productora Agrícola De Betania S.A.S. Zomac	901.238.769-6
19	Rio Cedro S.A.S.	800.073.566-1
20	Sanidad Vegetal S.A.S.	890.942.224-4
21	Wakate S.A.S	901.238.698-1

3 PARTIES RESPONSIBLE:

In all cases, the party responsible is the individual or corporation – public or private – which on its own behalf or in association with others, makes decisions based on the data and/or treatment of data. In short, the parties responsible for said treatment are the companies listed in the scope of this Policy in item 2 above, which are domiciled in the municipality of Envigado, Antioquia, and have their headquarters set at Calle 26 Sur No. 48-12, Website: www.greenland.co, and E-mail: protecciondatospersonales@greenland.co, Phone: (4) 3396262.

GENERAL PERSONAL DATA PROTECTION POLICY



4 POLICIES:

This Policy is issued in compliance with the National Constitution, Law 1581 of 2012, Regulatory Decree 1377 of 2013, 886 of 2014, and further rule applicable thereof. The following describes the policy approved by Grupo GreenLand related to the protection of personal data and privacy notices derived from its contractual relations with clients, vendors, producers, employees, partners, contractors, collaborators, or from fundraising programs; and all those individuals it has or has had any commercial or labor relation – to obtain true, pertinent, complete, updated, and exact information of the holder.

5 THE PROCESS:

Personal data provided to Grupo GreenLand may be processed, collected, stored, used, disclosed, suppressed, shared, updated, transferred, and transmitted to countries that guarantee proper personal data protection levels.

The foregoing is based on the terms and conditions applicable and abiding to the privacy policies set forth in the Law. This information will be used by Grupo GreenLand to facilitate the services it provides in accordance with its business purpose, and for labor, administrative, accounting, fiscal, commercial, advertising matters, and to contact the holders thereof.

The personal data collected will be solely used for the ends established in the data protection privacy or authorization notices placed by the Holders to authorize treatment thereof. Nonetheless, the databases may be also used for the following purposes:

- To send information to their employees, clients, vendors, producers, shareholders, contractors, collaborators, communities benefitting from social outreach programs, and overall, all individuals and/or companies Grupo GreenLand may have commercial or legal relations.
- To manage payroll payments, subscriptions to entities of the social security system, activities related to wellbeing and occupational health. In addition, to manage and operate – directly or through third parties - all personnel selection, hiring, or contracting processes, including the assessment, and rating of the attendees, verification of work and personal references, security background check-ups, and the registration of fingerprints when required.
- Establish contractual relations with clients, vendors, and contractors for the goods and services required by Grupo GreenLand for the normal operation of its businesses.

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- To determine obligations pending, to consult financial information and credit backgrounds as well as the report provided by information centers regarding obligations breached – pertaining to its debtors.
- To serve the requirements made by public or administrative entities to exercise their legal functions and writs.
- To answer any consultations, petitions, grievances made by holders, and to transfer Personal Data to control bodies and other authorities which should receive Personal Data in virtue of the applicable law.
- To enhance ties with its vendors, producers, and clients – sending highlights and information of interest.
- To notify authorized parties in case of any emergency during work hours or caused by the development thereof.
- To eventually contact individuals – by email or any other means - who Grupo GreenLand has or has had relation. This includes employees, former employees, and relatives thereof, shareholders, clients, vendors, producers, creditors, and debtors.
- To interact with its clients, vendors, employees, former employees, contractors, collaborators, and communities that benefit from social outreach programs – to verify compliance of its legal obligations and to be invited to events organized or sponsored by Grupo GreenLand.
- To register clients, vendors, and contractors in the systems of Grupo GreenLand, and process their payments.
- For marketing, communications, statistics, research, and other commercial activities that do not breach the law in force in Colombia.
- To transfer information collected to different areas of Grupo GreenLand in Colombia and overseas when necessary to develop their operations and payroll management (collecting accounts receivable and administrative charges, treasury, and accounting).
- For fraud control and prevention.
- For the prevention and control of money laundering and terrorism financing.
- To control access to Grupo GreenLand's offices and establish security measures, including the establishment of zones monitored by videos.
- Any other activity of similar nature to the foregoing deemed necessary to develop the business purpose of Grupo GreenLand.

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5.1 Obligations of the party responsible of personal data:

- To provide a complete and comprehensive copy to clients, vendors, producers, employees, and all those which have or have had any commercial or labor relation of this General Personal Data Protection Policy of Grupo GreenLand, to comply with the Law and to guarantee the parties' rights.
- To guard the information reported in the Database, with duly updates, during the term of the contractual relationship.
- To inform the holders about the rights to transfer information from the Databases to third parties duly authorized, using standards that equal or surpass the legal protection as determined by the Law or indicated by the Superintendence of Industry and Commerce.
- To send by email or physical: i) updates of products; ii) Relevant information or announcement for the Company; iii) Invitations to events organized by the Company or by third parties; iv) Communications in general; v) Offers, contracts; among others.
- Grupo GreenLand may manage the collection, treatment, management, and update of Databases through third parties, who in all cases shall abide to the current policy, signing a confidentiality agreement to guarantee the safety and good management of the entire information.

5.2 Obligation of the parties responsible of protecting personal data:

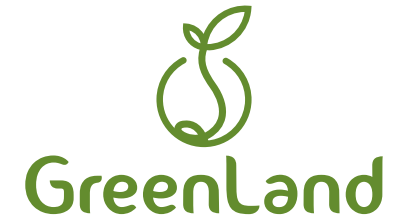
Grupo GreenLand shall protect the information in all cases limiting it to the goals for which it was provided and commits to providing it a proper treatment during its collection, storage, use, and final disposal; avoiding the non-authorized access to third parties which leads to know, vulnerate, amend, disclose and/or destroy the information that lies in the databases of Grupo GreenLand. Moreover, Grupo GreenLand shall guarantee that the safety protocols meet the control measures needed to minimize the loss, abuse, or change of the information.

5.3 Rights of the Information Holder:

All individuals, whose Personal Data are treated by Grupo GreenLand, are entitled to the rights established in the Political Constitution of Colombia, Law 1581 of 2012 and regulatory decrees thereof, and may particularly:

- To know the Personal Data which Grupo GreenLand is treating. Likewise, the holder may request at any moment to update or rectify his or her data.

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- Request proof of the authorization granted to Grupo GreenLand for the treatment of his or her Personal Data.
- To be informed by Grupo GreenLand, when requesting it, about the use of his or her Personal Data.
- To present to the Superintendence of Industry and Trade any grievances for sanctions for what is established in the Protection Act of Grupo GreenLand.
- Request from Grupo GreenLand the suppression of his or her Personal Data and/or revoke the authorization granted for treatment thereof in accordance with the procedures set forth in the General Personal Data Protection Policy of Grupo GreenLand. It is important to keep in mind that the request to suppress information and to revoke the authorization shall not proceed when the Information Holder has the legal or contractual duty to remain in the Database and/or files, or while the relation between the information holder and Grupo GreenLand is in force, in virtue of which the data was collected.
- To have free access to the Personal Data object of the protection.
- To refrain from answering questions about sensitive data, that is, answers pertaining to boys, girls, and teenagers, and related to health.

5.4 System for receiving and replying to petitions, queries, and complaints (PQC's) from the owners of personal data:

The owner of the information is entitled to file petitions, queries, and complaints (hereinafter PQC's), in writing. This must include the following information: (i) it must be addressed to Grupo GreenLand at the email protecciondatospersonales@greenland.co, or physically to the main office which is located at Calle 26 Sur No. 48-12, Envigado, Colombia; (ii) and must include the following information: data owner's name, identification, address, contact number, and email; (iii) any documents to support their PQC; and (iv) a clear presentation of the facts on which the request is based.

- For complaints: Grupo GreenLand will reply within the following fifteen (15) working days after the date on which the PQC is received. Should Grupo GreenLand not be able to reply to the PQC in that period, the petitioner must be informed indicating the reason for the delay and an exact date on which the solution or reply will be provided, which in no event shall be more than eight (8) working days after the expiration of the first term.

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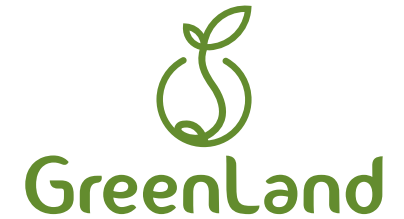


- For queries: Grupo GreenLand will reply within the following ten (10) working days after the date on which the PQC is received. Should Grupo GreenLand not be able to reply to the PQC in that period, the petitioner must be informed indicating the reason for the delay and an exact date on which the solution or reply will be provided, which in no event shall be more than five (5) working days after the expiration of the first term.
- Request for updates and/or rectifications: Grupo GreenLand will rectify and update, as requested by the data owner, any information that is incomplete or inaccurate, following the procedures and the terms indicated above. The following considerations shall apply:
 - The owner of the data must attach to the email protecciondatospersonales@greenland.co, or a physical document addressed to the Personal Data Protection Officer indicating the update and/or correction to be performed, and attach documentation to support their request.
 - Grupo GreenLand may enable mechanisms to make it easy for the owner of the data to exercise this right, provided such mechanisms are for their benefit. Therefore, electronic, or other pertinent media may be enabled, and such will be reported in the privacy notice and be made available to the interested parties on the company's webpage.
- Request to suppress data:

The owner of the personal information is entitled to ask Grupo GreenLand to suppress (eliminate) their data in any of the following cases:

 - If they believe that the data are not being treated according to the principles, duties, and obligations set forth in the current regulations.
 - if they are no longer necessary or relevant to the purpose for which they were collected.
 - if the time required for fulfilling the purposes for which the data were requested has expired. Such suppression involves the complete or partial elimination of personal information as requested by the owner, from the records, files, databases, or treatment by Grupo GreenLand. However, this right of the data owner is not absolute and, therefore, Grupo GreenLand may refuse this right if:
 - i) the owner has a legal or contractual duty to remain in the database.
 - ii) the elimination of data might hinder judicial or administrative actions involving fiscal obligations, investigation, and prosecution of crimes, or updating administrative sanctions.

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- iii) the data are needed to protect the data owner's legally challenged rights, to file a public interest action, or to discharge an obligation legally acquired by the owner of the data.
- The data owner agrees that any decisions made by Grupo GreenLand as part of a PQC process shall be carried out via email.

5.5 Data about minors:

in the event that the individuals responsible are dealing with sensitive data, the company guarantees that prior and express authorization shall be obtained for the use of such data, in compliance with the following obligations:

- The owner of the data shall be notified that, because these are sensitive data, they are not obligated to authorize treatment of their data.
- The owner of the data shall be notified expressly and in advance, of which are the sensitive data and the purpose for which such data will be treated.
- Especially in the case of minors, their legal representatives may give the authorization after the minor has exercised the right to be heard.

5.6 Substantial changes to the policy:

Before it is implemented, any substantial change, update, suppression, or correction included in this policy shall be communicated to the owners of the personal information through GreenLand's webpage, in the About Us section, and inside the Group through the intranet, to announce a change to intermediaries, vendors, and third parties, as appropriate. In addition, any other medium may be used to efficiently communicate this change. Grupo GreenLand reserves the right to change the Personal Data Protection Policy at any time.

6 MONITORING AND COMPLIANCE:

Compliance with this policy shall be regularly reviewed and evaluated by the company's control department. Noncompliance with this policy shall be considered GROSS MISCONDUCT and will give rise to the appropriate disciplinary measures.



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7 VERSION CONTROL:

EFFECTIVE DATE	TYPE OF CHANGE	MADE BY	APPROVED BY
01/05/2019	V1: Compliance with decree-law 1581 OF 2012	Head of the document management center	Administrative management
12/06/2020	V2: Update to the structure and addition of Grupo Empresarial GreenLand.	Head of the document management center	Administrative management
21/02/2022	V3: Update to the structure and addition of companies from Grupo Empresarial.	Head of the document management center	Administrative management