

Personal Data Processing Policy

AVIENT COLOMBIA S.A.S.

Effective date: August 19, 2025	Privacy contact: Privacy.colombia@avient.com
Region: Colombia	Scope: Processing personal data in Colombia
Approved by: Security and Privacy Sub-Committee July 15, 2025	Last review: July 9, 2025
Purpose: This document establishes mandatory rules for processing personal data in Colombia. It constitutes a local addendum to the global privacy policies.	

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I. INTRODUCTION

Avient Colombia S.A.S., hereinafter Avient or The Company, is a subsidiary company and is part of Avient Corporation. As part of the corporate group, the management and protection of the personal data of our employees, customers, suppliers and strategic allies are governed

by the same principles, standards and guidelines established in the *Global Privacy and Data Protection Policy*. **Consequently, this personal data processing policy is harmonized and aligned with the policies of Avient Corporation.**

This Personal Data Processing Policy applies specifically to the processing of personal data within Colombia by Avient Colombia S.A.S. It is intended as a local addendum to the:

- Avient Privacy Statement
- Global Privacy and Data Protection Policy
- Global Avient Candidates Privacy Notice
- Global Avient Employees Privacy Notice

In the event of any conflict or inconsistency between this Policy and the documents mentioned above, the provisions of the global documents shall prevail, unless otherwise required by the Colombian law.

In this sense, Avient as a leading company of specialized polymer solutions, which offer polymeric formulations and in general provides materials and solutions for customers of various industries, respects individual privacy and values the trust of its employees, associates, customers, suppliers, contractors and business partners and recognizes its responsibility when carrying out the collection of personal data in the various processes that are carried out within the company. enterprise.

For this reason, Avient, as the person responsible for the information, strives to receive, store, use, preserve, disclose, transmit and transfer personal information in compliance with Colombian legislation on data protection, in accordance with the provisions of Statutory Law 1581 of 2012 *"By which general provisions for the protection of personal data are dictated"*, of Decree 1074 of 2015 (which incorporated Decree 1377 of 2013), Title V of the Single Circular of the Superintendence of Industry and Commerce and other concordant regulations.

In this sense, it complies with all laws and regulations of Colombia applicable to the protection of the right of habeas data regarding the collection, use and conservation of personal information by digital and physical means that is contained in the recognized contractual commitments, thus having a solid and clear privacy and data protection policy that addresses all legal requirements, and applicable business requirements in Colombia, as well as recognizes that failure to comply with these regulations may result in criminal and civil penalties, monetary loss, and damage to Avient's hard-earned reputation.

II. SCOPE

This Policy sets out the guiding principles that must apply to the collection, storage, use, retention, disclosure, transmission and transfer of personal data, including those relevant to Avient's current, former and potential employees, customers, suppliers, contractors and business partners. This includes any processing of data in electronic form (including e-mail

and documents created with word processing software), information maintained in structured manual files regarding individuals, and information shared with third parties. Thus, it applies to all files and databases that contain personal data and are subject to processing by Avient Colombia, as responsible or Processor, as well as any third party in Colombia or abroad that acts as a Data Processor by our mandate. This is applicable to all employees, contractors and suppliers who have a relationship with Avient and carry out the processing on the bases containing personal data, in accordance with the established purposes.

III. COMPROMISO DE AVIENT

Avient Colombia S.A.S will abide by this Policy, comply with its terms, principles and guidelines in all its business activities. Likewise, it will strive for its employees, associates, customers, suppliers, contractors and business partners to comply with this policy in accordance with the established guidelines.

IV. DEFINITIONS

For the purposes of this Policy, the following definitions will be taken into account, in the terms set forth in Statutory Law 1581 of 2012 and other concordant regulations:

- **AUTHORIZATION:** Prior, express and informed consent of the Owner to carry out the Processing of personal data.
- **PRIVACY NOTICE.** Verbal or written communication generated by the Responsible Party, addressed to the Owner for the Processing of his/her personal data, through which he/she is informed about the existence of the information Processing policies that will be applicable to him/her, the way to access them and the purposes of the Processing that is intended to be given to the personal data.
- **DATABASE:** Organized set of personal data that is subject to Processing.
- **PERSONAL DATA:** Any information linked to or that can be associated with one or more specific or determinable natural persons.
- **PUBLIC DATA:** It is the data that is not semi-private, private or sensitive. Public data includes, but is not limited to, data relating to the marital status of persons, their profession or trade and their status as a merchant or public servant. By their nature, public data may be contained, inter alia, in public registers, public documents, official gazettes and gazettes, and duly enforceable court judgments that are not subject to confidentiality.

- **SENSITIVE DATA.** Sensitive data is understood to be data that affects the privacy of the Data Controller or whose improper use may lead to discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions, social or human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties. as well as data relating to health, sex life, and biometric data.
- **DATA PROCESSOR:** Natural or legal person, public or private, that by itself or in association with others, carries out the Processing of personal data on behalf of the Data Controller.
- **DATA CONTROLLER:** Natural or legal person, public or private, who by itself or in association with others, decides on the data database and/or the Processing of the data.
- **OWNER:** Natural person whose personal data are subject to Processing.
- **TRANSFER:** The transfer of data takes place when the Controller and/or Processor of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is the Controller and is located inside or outside the country.
- **TRANSMISSION:** Processing of personal data that involves the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a Processing by the Processor on behalf of the Responsible Party.
- **PROCESSING:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

V. CONTROLLER AND PROCESSOR

AVIENT COLOMBIA S.A.S. legally constituted company identified with NIT 900896246 - 4, with address at Autopista Medellín KM. 2.5 - Vía Parcelas KM. 1.0 Vereda Siberia in Cota (Cundinamarca), telephone 57 601 5084700.

VI. PROCESSING OF PERSONAL DATA

Avient is the controller of personal data, such that it will collect, store, use, retain, disclose, transmit and transfer personal information solely for business purposes and the conduct of the company's operations, at all times in accordance with Avient's values and applicable local laws regarding the privacy of the owner and the protection of personal information.

For this reason, Avient may collect and process personal data depending on the quality of the owner, i.e. whether they are employees, associates, customers, suppliers, contractors and business partners. The personal data collected is based on the information you have provided to Avient, your role within The Company, and the extent to which you use voluntary benefits and programs.

In this sense, personal data will be collected through authorized means such as physical documents, forms, emails, telephone, text message, own or allied third-party information systems, website, instant messaging applications, video processing systems, photographs, videos and biometric records, among others for the purposes identified in this policy. authorised by the owners and will be kept only for the time necessary for this purpose, so that once the purpose is fulfilled they will be discarded in a way that prevents loss, theft, misuse or unauthorised access.

Avient collects your personal information in a variety of ways. The most common method of collecting them is when you directly provide your personal information as the owner, however, we also collect your personal data through third parties as long as the owner has given their consent.

VII. PROCESSING OF SENSITIVE DATA

Avient only collects sensitive personal information to the extent permitted by law, and only when there is a substantial business need or arising from the common conduct of the Company's operations, undertaking to inform the data subject of this condition during the collection process.

In accordance with Article 6 of Law 1581 of 2012, in order to carry out the collection and processing of sensitive data, it will be essential to have the explicit approval of the owner or legal representative, in the case of minors, specifically declaring the purpose of its collection; and provided that the following causes are underway: (i) the processing is required to safeguard the vital interest of the owner and he is physically or legally incapacitated; (ii) is carried out in the course of legitimate activities by non-profit organizations; (iii) When the processing has a historical, statistical or scientific purpose. In these events, appropriate measures must be adopted for the suppression of the identity of the Holders and (iv) for the recognition of judicial rights.

In accordance with the legal provisions and in accordance with our data processing policy, the owner is not obliged to authorise the processing of sensitive data and the delivery of such information is freely available, unless this information is strictly necessary to comply with Avient's obligations and if it does not have it, it would be impossible to provide the services and fulfill our corporate purpose.

VIII. PURPOSES OF DATA PROCESSING

The following are the purposes for which the Company collects and processes your personal data, according to the quality of the owner of the information:

EMPLOYEE:

- To facilitate your employment relationship and/or contract;
- To provide you with benefits, including financial, medical, health, and wellness;
- To promote the participation of employees in training, training, recognition, or related activities;
- To manage the linking, affiliation and reporting in the Comprehensive Social Security System (health, pensions, occupational risks and parafiscal contributions) and other obligations of a labor and benefit nature.
- To comply with government-requested reporting requirements and other legal obligations, and to seek advice in this regard;
- To comply with the instructions of the competent judicial and administrative authorities.
- To manage internal processes within the framework of labor relations, such as performance evaluations, disciplinary processes, investigations, conflicts of interest, application of the code of conduct, internal work regulations, among others.
- To execute and comply with the actions of the Occupational Health and Safety Management System;
- To facilitate the proper use and protection of information resources and corporate systems;
- To create, protect, store and manage intellectual property;
- To take inputs from photographic, video or related records and eventually publish them on the company's website or social networks; for advertising or promotional purposes of the company and, in general, for any procedure or procedure required within the scope of the employment relationship signed between the parties.
- For the adoption of measures aimed at the prevention of illicit activities, and consultation on public, private, national or international bases within the scope of the management of the risk of money laundering and financing of terrorism.
- For activities related to mergers and acquisitions, maintenance of subsidiaries and legal advice;
- To record and capture images or any other record that serves as support and evidence of the meetings and events held;
- To manage security camera recordings with both film and photographic records to carry out the control of the safety of personnel and facilities.
- To transfer and transmit personal data with those authorized third parties that have a relationship with **AVIENT COLOMBIA S.A.S.** and are necessary for the development of the company's activities and corporate purpose, within the framework of the corresponding contractual relationship.
- To receive or collect information that is provided by WhatsApp or other instant messaging applications for the development of the activities of the development of the employment relationship

- For any other related activity, which may be communicated to you from time to time, and with your consent where appropriate.

CANDIDATES:

- To process your application for employment or services; To process your application for employment or services;
- To enable candidates to submit applications and create their candidate profiles;
- To evaluate the profile of the applicants, evaluate the qualifications for a given position and advance the recruitment process and the interviews of the candidates;
- To verify your identity and suitability for employment;
- To conduct legally permissible criminal, medical, and credit background checks and conduct security screenings, should they be selected for a position.
- To verify employment references and recommendations;
- To carry out occupational medical examinations for candidates prior to their entry;
- To receive or collect information that is provided by WhatsApp or other instant messaging applications for the development of the selection process;
- To record and capture images or any other record that serves as support and evidence of the meetings and events held:
- To manage security camera recordings with both film and photographic records to carry out the control of the safety of personnel and facilities.
- For the reimbursement of candidates' expenses and travel;
- To transfer and transmit personal data with those authorized third parties that have a relationship with Avient Colombia and are necessary to provide recruitment services, background checks and similar services to comply with the purposes contained herein;
- For any other related activity that may be publicly communicated or announced from time to time, and with your consent where applicable.

SUPPLIERS AND CONTRACTORS:

- To establish the commercial and legal relationship with suppliers, facilitating their registration in the Company's management systems for the execution of the accounting, logistical and financial processes of the operation;
- To report on activities in relation to its status as supplier and contractor personnel;
- To check background and analyze possible linking risks related to Money Laundering and Terrorist Financing, in order to ensure the suitability and reliability of business relationships;
- To consult restrictive lists of the company, the partners and their legal representatives;
- To execute, by any means, directly or through third parties, activities related to billing, collection management, collection, logistics, customer service, verifications and consultations, enabling means of payment, as well as any other action related to

products and services, both current and future, in order to comply with Avient's contractual obligations and mission purpose;

- To comply with the commercial obligations established between the parties;
- To send commercial and/or marketing information related to the products and services offered by The Company;
- To meet requirements from authorities when necessary;
- To record and capture images or any other record that serves as support and evidence of the meetings and events held;
- To manage security camera recordings with both film and photographic records to carry out the control of the safety of personnel and facilities.
- To receive or collect information that is provided by WhatsApp or other instant messaging applications for the development of the activities of the development of the commercial relationship;
- Transfer and transmit personal data with those authorized third parties that have a relationship with Avient Colombia and that are necessary for the development of the company's activities and corporate purpose.

CLIENTS

- To establish the commercial and legal relationship with customers, facilitating their registration in the Company's management systems for the execution of the accounting, logistical and financial processes of the operation;
- To execute, by any means, directly or through third parties, activities related to billing, collection management, collection, logistics, customer service, verifications and consultations, enabling means of payment, as well as any other action related to products and services, both current and future, in order to comply with Avient's contractual obligations and mission purpose;
- To consult and make reports to risk centers the databases of commercial and financial relations; as well as consult the restrictive lists of the company, the partners and their legal representatives to prevent the entities from being used for money laundering or to finance illicit activities;
- To verify information for customer selection and follow-up;
- To send by any physical or electronic means, text message and instant messaging, media known or to be known, information of a commercial, marketing, promotional nature related to the products offered by the company;
- To develop marketing and market management activities;
- To record and capture images or any other record that serves as support and evidence of the meetings and events held;
- To manage security camera recordings with both film and photographic records to carry out the control of the safety of personnel and facilities.
- To receive or collect information that is provided by WhatsApp or other instant messaging applications for the development of the activities of the development of the commercial relationship;

- To transfer and transmit personal data with those authorized third parties that have a relationship with Avient Colombia and are necessary for the development of the company's activities and corporate purpose.

VISITORS AND THIRD PARTIES

- To safeguard the physical safety of all personnel inside the AVIENT facilities;
- To implement evacuation plans in the event of any contingency, ensuring the safety of each person inside the company;
- To capture data from people who enter the company through video surveillance systems and different records;
- To use information as evidentiary material in the event of a criminal act where the records may be useful for that purpose;
- To transfer and transmit personal data with those authorized third parties that are necessary for the development of the company's activities and corporate purpose.

SOCIAL MANAGEMENT AND SUSTAINABILITY

- To implement social programs aimed at interest groups;
- To facilitate the execution of social investment and sustainability initiatives and projects for the benefit of the community promoted, developed and/or sponsored by The Company.

Personal information collected by Avient may be shared with application vendors, consultants, contractors, government entities, legal advisors, and third-party service providers, such as computer and support system providers, insurance, payroll, employee expense processing, visas and travel assistance, employee benefits, stock options and rewards, credit card companies, and other internal support services, such as employee surveys, employee rewards and recognition, market compensation analysis, project and resource management, and research agencies for fraud detection and investigation.

IX. TRANSFER OF DATA TO THIRD PARTIES

Avient will transfer personal information to third parties only for lawful and customary business purposes, and only when Avient has assurances that the information will be adequately processed and protected in compliance with applicable laws and regulations. The Company will take appropriate steps to confirm that third parties from whom personal information is collected are trusted sources that lawfully collect information. The obligations acquired with the transfer will be left in writing to provide an adequate level of protection

and always based on confidentiality agreements through which the confidentiality of the information and the due compliance with this Personal Data Processing Policy are protected.

X. CROSS-BORDER TRANSFERS

The personal data collected by Avient Colombia may be transferred to global or regional headquarters in the course of the company's activity.

In order to comply with data protection laws in Colombian law, Avient has entered into an International Data Transfer Agreement within the Group, under which all data importers outside of the Group are obliged to process and protect all personal information received in accordance with the standard controller-to-controller contractual clauses (the "Clauses"), approved by the European Commission.

Data transfers to external service providers are ensured by applying the safeguards required by applicable data protection legislation

Third-party service providers are expected to protect the confidentiality and security of personal information, and only use personal information for the provision of services to Avient, and in accordance with Colombian law. In that sense. The outputs of personal data of customers, suppliers, users and employees must be made taking into account the following guidelines:

- Security measures must be established to prevent access or manipulation of the information to unauthorized third parties.
- Confirm that the transfer of data is carried out, confirm the guidelines and the treatment policy, always regardless of the purposes of the use of the data collected.
- Prior to data transfer, have the consent and authorization of the person in charge, and keep a record of the permissions
- In the event that the transfer is made for the execution of a project, contract, framework agreement, etc., it must be ensured that it is carried out under the agreed conditions and by secure means.
- It must be certain that the third party to which the information is transferred complies with all the established security measures.

XI. RIGHTS OF THE OWNERS

In accordance with Law 1581 of 2012 and other concordant laws, the owners of personal data will have the following rights:

- Know, update and rectify your personal data before the data controllers or Data Processors. This right may be exercised, among others, in the face of partial, inaccurate, incomplete, fragmented, misleading data, or data whose processing is expressly prohibited or has not been authorised.

- Request proof of the authorisation granted to the data controller, except when expressly exempted as a requirement for the processing.
- To be informed by the controller or the Data Processor, upon request, regarding the use made of their personal data.
- To file complaints with the Superintendence of Industry and Commerce for violations of the provisions of Statutory Law 1581 of 2012 and the other regulations that modify, add or complement it. Revoke the authorization and/or request the deletion of the data when the principles, rights and constitutional and legal guarantees of the Data Subject are not respected in the processing. The revocation and/or suspension will proceed when the Superintendence of Industry and Commerce has determined that in the processing of personal data the Responsible or Person in Charge of the same have incurred in conduct contrary to Statutory Law 1581 of 2012 and the Constitution.
- Access, free of charge, your personal data that has been processed.

XII. PROCEDURE FOR DEALING WITH QUERIES AND COMPLAINTS

Avient will implement strict measures that guarantee the confidentiality and proper use of the data, therefore, in the event that the owners want to exercise their rights as owners, or when they detect the possible breach of any of the obligations established in current legislation, they must carry out the procedure established below. These requests must be sent by email to privacy.colombia@avient.com channel specifically designated for this purpose or through the Data Subject Request Form, a virtual format available on www.avient.com ([Privacy Portal](#)).

XIII. CONSULTATIONS

The owners, their successors, representatives or authorized third parties may consult the personal information stored in the Company's databases, by email addressed to privacy.colombia@avient.com, account designated for this purpose or through the a virtual format available on www.avient.com ([Privacy Portal](#)).

To make the consultation, the owner must prove his identity, the successor must prove his or her quality, and the authorized third party must present the respective authorization.

Inquiries will be answered within a maximum period of ten (10) business days from the date of receipt. If it is not possible to respond to the request within this period, the interested party will be notified, explaining the reasons and indicating a new response date, which may not exceed five (5) business days following the expiration of the first term.

XIV. COMPLAINTS (CORRECTION, UPDATING, RECTIFICATION OR DELETION)

In this specific case, when the owners consider that their personal data should be subject to correction, updating, rectification or deletion, or failing that, if they believe that data protection regulations are not being complied with, they have the right to file a complaint. This right can also be exercised by your legal representatives or successors.

In this sense, the applicant must submit their application through the measures provided in this Policy, where they prove their status as owner, successor or legal representative, make a clear description of the problem they have detected and the documents that are intended to be asserted.

In the event that the application is incomplete, Avient will notify you within 5 days of this situation and you as the owner will have 2 months to complete the missing information. If you do not do so within this period, it will be understood that you have withdrawn the claim. In the event that Avient is not competent to resolve the complaint, it will transfer it to the correct entity within a maximum of 2 business days and inform you about this transfer.

When the claim meets all the requirements and is complete, a legend that says "claim in process" will be included in the database along with the reason for it, within a period of no more than 2 business days. This annotation will be kept until your request is resolved.

Once the information has been received, the maximum resolution period is 15 working days from the day following its receipt. If more time is required, Avient will explain the reasons and inform a new response date, which may not exceed 8 working days in addition to the initial deadline.

In cases of modifications or revocation of the authorization, the procedure will be the same, for that purpose.

XV. POLICY CHANGES AND EFFECTIVENESS

Avient advises that this policy may be modified by the Security and Privacy Sub-Committee, in conjunction with the Security and Privacy Executive Committee, when deemed necessary in compliance with the requirements of applicable law. Such changes shall be duly notified and posted at www.avient.com, this with the aim of ensuring that all owners can know about the conditions of use of their personal data. If you, as the owner of personal data, do not agree with the changes made to the personal data protection policy, we request that you exercise your right of habeas data in accordance with the channels established in the second point of this policy.