

PERSONAL DATA PROCESSING POLICY		
Code: GERG-FOR-011	Date: 25-07-2025	Version: 001

PERSONAL DATA PROCESSING POLICY

DATE OF PREPARATION: 23/07/2025	DATE OF REVIEW: 24/07/2025	DATE OF APPROVAL: 25/07/2025
RESPONSIBLE: People and Development Partner	RESPONSIBLE: Management Representative	RESPONSIBLE: Regional Commercial and Operations Manager

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7 SEAS ENERGY S.A.S., in compliance with the provisions of Law 1581 of 2012, Decree 1377 of 2013, and other regulations that complement, amend, or replace them, adopts this Personal Data Processing Policy in order to guarantee the protection of the rights of privacy, intimacy, and habeas data of all individuals whose personal data are collected, stored, used, processed, or circulated by the company.

This policy applies to all personal data processed by 7 SEAS ENERGY S.A.S. within the framework of its corporate activities, including data from employees, clients, suppliers, contractors, strategic partners, and any third party with whom there is a contractual, commercial, or legal relationship.

The processing of personal data will be carried out based on the principles of legality, purpose, freedom, truthfulness, transparency, restricted access and circulation, security, and confidentiality.

Personal data shall be understood as any information linked or that may be associated with one or more identified or identifiable natural persons. This includes, among others, information such as names, surnames, identification numbers, addresses, email addresses, phone numbers, employment history, banking information, images, biometric records, and others. In the case of sensitive data or data concerning minors, special protection will be guaranteed in accordance with applicable law.

Personal data collected by 7 SEAS ENERGY S.A.S. will be used exclusively for the purposes previously informed to and authorized by the data subject. These purposes include, but are not limited to:

- Execution of contractual relationships;
- Compliance with labor, commercial, and legal obligations;
- Response to requests from authorities;
- Development of administrative, financial, and accounting processes;
- Sending of corporate communications;
- Performance evaluation; and
- Management of occupational safety and health processes.

7 SEAS ENERGY S.A.S. will inform the data subject, in advance, expressly, and unequivocally, about the purpose of the data processing and will request their authorization through the official form entitled "Authorization for the Processing of Personal Data." This document will be sent for completion, acceptance, and signature and will form part of the company's records, supporting the legitimate use of the information provided.

Data subjects have the right to access, update, rectify, delete, or revoke their authorization for the processing of their data, as long as such actions do not conflict with current contractual or legal obligations. These requests can be made in writing via email to hse@7seasenergy.com.co, and will be handled by the Regional HSEQ & People Manager within the time limits established by law.

7 SEAS ENERGY S.A.S. will implement the necessary technical, human, and administrative measures to ensure the security and confidentiality of personal data, preventing its alteration, loss, unauthorized access, or fraudulent use. The company will retain personal data only for the time reasonably necessary according to the purposes of processing and applicable regulations.

This policy is mandatory for all employees of 7 SEAS ENERGY S.A.S. as well as for any third party who, as a data processor or recipient, has access to the organization's databases. The company may update this policy at any time and will notify data subjects of any relevant changes when required.

7 SEAS ENERGY S.A.S. reaffirms its commitment to privacy and personal data protection, promoting a culture of responsible information management as part of its corporate best practices.

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MANUEL ERNESTO ROJAS ROMÁN
Legal Representative
Prepared on July 23, 2025

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CHANGES AND MODIFICATIONS

Version	Date	Description of Change	Responsible for Change	Approved by
001	23/07/2025	Document creation	Not applicable	Not applicable