

1. OBJECTIVE

Establish the procedures and guidelines that must govern the processing of Personal Data in accordance with the applicable regulation.

2. SCOPE

The application of this procedure is the responsibility of each of the areas of Grupo Aval that, in the exercise of its functions, carries out the Processing of Personal Data in the terms described in this document. It is the responsibility of all collaborators to know, abide by and apply the provisions established in this document.

The provisions of this document apply to all natural persons who have a relationship with Grupo Aval (e.g., shareholders, collaborators, suppliers), and to those legal entities on which information is collected on the data of their legal representatives or collaborators and on which the Personal Data Processing is carried out in the terms described herein.

These procedures shall not apply to:

- Databases and files whose purpose is the prevention, detection, monitoring and control of money laundering and terrorist financing;
- The databases and files regulated by Law 1266 of 2008, which dictates the general provisions of habeas data and regulates the management of information contained in personal databases, especially financial, credit, commercial, services and that from third countries, and other provisions are issued.

3. GLOSSARY

- **Authorization:** prior, express and informed consent of the Data Subject to carry out the Processing of Personal Data.
- **Privacy Notice:** verbal or written communication generated by the Controller, addressed to the Data Subject for the Processing of their Personal Data, through which they are informed about the existence of the information processing policies that will be applicable to them, 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 are subject to Processing.
- **Personal Data:** Any information linked to or that can be associated with one or more specific or determinable natural persons.
- **Private Data:** this is the data that, due to its intimate or reserved nature, is only relevant to the Data Subject.
- **Public Data:** is data that is not semi-private, private or sensitive. Public data includes, inter alia, data relating to the marital status of persons, the ID number (Article 213 of the Electoral Code), their profession or trade, and their status as a merchant or public servant. By their nature, public data

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may be contained, among others, in public registers, public documents, gazettes, official bulletins, duly enforceable judicial rulings that are not subject to confidentiality. The Processing of these data may be carried out without the prior authorization of the Data Subject, but the Processing of such data must comply with the principles and duties enshrined in Law 1581 of 2012.

- **Semi-Private Data:** semi-private data is data that is not intimate, reserved, or public in nature and whose knowledge or disclosure may be of interest not only to its data subject but also to a certain sector or group of people or to society in general.
- **Sensitive Data:** are those data that affect the privacy of the Data Subject or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions, social organizations, human rights organizations 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.

This category of Personal Data has special protection, so its Processing is prohibited, except in the following events:

- The Data Subject has given their Authorization, except in cases in which such Authorization is not required by law;
 - The Processing is necessary to protect the vital interest of the Data Subject;
 - The Processing refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process; or
 - The Processing has a historical, statistical or scientific purpose, for which it will be necessary to delete the identity of the Data Subjects.
- **DECEVAL:** Centralized Securities Depository of Colombia Deceval S.A., Grupo Aval's Provider in charge of the administration of the shares and the company's shareholders' ledger who acts as registration agent, transfer agent, payment agent and supports the assistance of Grupo Aval shareholders.
 - **Data Processor:** natural or legal person, public or private, who 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 database and/or the Processing of the data.
 - **Transfer:** Data transfer 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 has the purpose of carrying out Processing by the Processor on behalf of the Controller.
 - **Data Subject:** Natural person whose Personal Data is subject to Processing.

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- **Processing or Process:** Any operation or set of operations on Personal Data, such as collection, storage, use, circulation or deletion.

4. EXTERNAL STANDARDS

- Law 1581 of 2012 which dictates general provisions for the protection of Personal Data.
- Decree 1377 of 2013, which partially regulates Law 1581 of 2012 in aspects related to the authorization of the Data Subject of the Information, the transfers of Personal Data and the demonstrated responsibility for the processing of Personal Data.
- Decree 886 of 2014, which partially regulates Law 1581 of 2012 in relation to the National Registry of Databases.
- Article 15 of the Political Constitution of Colombia that enshrines the rights to privacy, good name and the protection of Personal Data or habeas data.
- Any other provision that modifies, regulates, replaces or repeals the aforementioned rules.

5. USE, NATURE AND PURPOSES OF THE DATA SUBJECTS' INFORMATION

In accordance with the Habeas Data regulations in force in Colombia, Grupo Aval, in the development of its commercial activities, may collect, store, manage and process the Personal Data of the Subjects, whose nature of the information is described below and may include:

- Personally identifiable data.
- Personal contact details
- Employment data
- Financial or economic data.

The purpose and use of this information will be restricted only to the purposes authorized by the Data Subject, as well as the fulfilment of Grupo Aval's commercial relations with its interested parties.

5.1 Shareholders

Grupo Aval does not directly collect information about its shareholders. The foregoing, taking into account that DECEVAL acts as administrator of the shares and the shareholders' ledger of Grupo Aval. The information contained in Grupo Aval's Shareholders' Ledger is confidential information because it is registered in commercial books.

In addition to the above, DECEVAL provides the following periodic information to Grupo Aval:

- **Balances:** Contains the number and class of shares held by each shareholder. This information is downloaded from an application provided directly by DECEVAL. The Vice Presidency of Accounting Consolidation and the Senior Management of Strategic Planning and Investor Relations have

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access to this information. This information is used to make dividend payments and meet the information requirements made by shareholders and competent entities.

- **Certifications for the Income Tax Return:** This information is provided annually to Grupo Aval in digital media, which feeds the application of the Grupo Aval website: www.grupoaval.com. The Vice Presidency of Accounting Consolidation and the Senior Management of Strategic Planning and Investor Relations have access to this information to respond to requests for information from shareholders and information requirements from the competent entities. This information can also be consulted directly by each of the shareholders after validating their information (including their *Investor Account* number in DECEVAL) on the www.grupoaval.com website.
- **Monthly reports:** These reports include call center management and requests handled directly by DECEVAL. This information is managed by the Senior Management of Strategic Planning and Investor Relations for statistical purposes and quality control in customer service.

Grupo Aval will only use the Personal Data of shareholders to comply with the obligations established in the Company's Bylaws and in the rules applicable for these purposes. Any other use is prohibited.

5.2 Collaborators

During the selection processes, Grupo Aval will inform the interested parties about the Processing that will be given to the Personal Data that they provide or that are obtained during said process. The Administrative and Human Talent Management, using the Form "Authorization for the Processing of Personal Data of candidates in selection processes that is attached to this document," must inform the people who participate in selection processes about the conservation and potential Processing of their Personal Data.

The Personal Data provided or obtained with respect to the candidates who are chosen during selection processes will be kept in physical and/or electronic folders with appropriate security measures. Only the Administrative and Human Talent Management may have access to this information. The Administrative and Human Talent Management must obtain authorization from the candidates who are chosen during selection processes. For these purposes, Grupo Aval's employment contracts must contain a Personal Data Processing clause, prepared with the support of the Company's external labor advisor.

Once the employment relationship is terminated, for historical and registration purposes, Grupo Aval will keep the information obtained during the employment relationship, which must be subject to adequate security standards, and to which only the Administrative and Human Talent Management will have access. Grupo Aval may not transfer Personal Data of its collaborators and/or candidates who participate in selection processes to third parties, except with prior written authorization.

5.3 Suppliers

Grupo Aval will collect the information that is necessary to carry out selection processes for suppliers of goods and services. Within the supplier selection processes, it is possible that Grupo Aval may have access to Personal Data of natural person suppliers or employees of legal entity suppliers. Suppliers shall be understood as any third party that supplies goods or services for Grupo Aval. In this sense, when there are engagements of natural persons as suppliers, the Administrative and Human Talent

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Management must make use of the following text within the "Registration and/or Update of Suppliers" form of Grupo Aval. Likewise, Grupo Aval must inform its suppliers about the conservation and potential processing of their Personal Data:

AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA

The Supplier authorizes Grupo Aval to collect, store, use and transfer its personal data and those of its employees, shareholders or contractors, to other subordinate entities of Grupo Aval, to keep the supplier registry updated, as well as to carry out commercial, financial, risk and statistical analyses.

Likewise, the Supplier states that it has been informed about the following aspects related to compliance with the habeas data and personal data legislation that is in force in Colombia:

- a) As the Data Subject of the information provided to Grupo Aval, the Supplier has the right to know, update and rectify their personal data, request proof of the authorization granted for their processing, be informed about the use that has been given to them, file complaints with the Superintendence of Industry and Commerce for violation of the law, revoke the authorization, request the deletion of their data in cases where it is appropriate and access them free of charge.
- b) The optional nature of responding to requests for information on Sensitive Data, understanding sensitive data as those that affect the privacy of their Data Subject or whose improper use may generate discrimination.
- c) Any concerns related to the Processing of their personal data will be addressed by:

Grupo Aval Acciones y Valores S.A.
Attention: Corporate Legal Vice Presidency
Email: jrincon@grupoaval.com and/or jarias@grupoaval.com
Address: Carrera 13 No. 26A-47 Piso 23
City: Bogotá D.C.

By accepting these Terms and Conditions, the Supplier declares that it has been authorized by its employees, shareholders and/or contractors for the purposes of complying with the provisions herein.

The Supplier may consult our Personal Data Processing Policy published on the Grupo Aval website www.grupoaval.com, in the "Home" – "Personal Data Processing Policy" menu

Grupo Aval will process the Personal Data to which it has access in the development of supplier selection processes for the sole purpose of:

- Choosing the supplier, negotiating and executing the contract or any other legal transaction that arises between Grupo Aval and the supplier that is selected.
- Carrying out background checks related to the natural person supplier or the employees of the legal person supplier.

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- Verifying the moral and professional suitability of suppliers who are natural persons or employees of suppliers who are legal persons.

5.4 Others

Others refer to any natural person who delivers Personal Data to Grupo Aval for the purpose of being Processed. This category includes individuals who participate in contests, brand activations and use of services or technological platforms offered by Grupo Aval, among others, as long as they provide Personal Data.

In cases where the information collected by Grupo Aval requires to be transferred or transmitted to a provider or a third party, this purpose will be included in the authorizations that the Data Subjects give to Grupo Aval.

6. PRINCIPLES

The Processing of Personal Data provided to Grupo Aval will be guided by the following principles:

- **Principle of legality:** The Processing of Personal Data is a regulated activity that must comply with the provisions of the rules mentioned in numeral 4 of this document.
- **Principle of purpose:** The Processing of Personal Data must obey a legitimate purpose that must always be informed to the Data Subject.
- **Principle of freedom:** The Processing of Personal Data may only be exercised with the prior, express and informed consent of the Data Subject. Personal Data may not be obtained or disclosed without prior authorization, except in the existence of a legal or judicial mandate.
- **Principle of truthfulness:** Partial, incomplete, fragmented or misleading Personal Data may not be processed; in this sense, for its processing, Personal Data must be truthful, complete, exact, updated, verifiable and understandable.
- **Principle of transparency:** The Data Subject of the Personal Data held by Grupo Aval has the right to obtain information about the existence of their data;
- **Principle of access and restricted circulation:** The Processing is subject to the limits that derive from the nature of the Personal Data and the provisions of the rules mentioned in numeral 4 of this document. Therefore, the Processing may only be carried out by persons authorized by the Data Subject and/or by the persons authorized by the applicable legislation. With the exception of public information, the Personal Data held by Grupo Aval will not be published on the Internet or other means of dissemination or mass communication, unless access to such information can be made exclusively by the Data Subject or third parties authorized by him.
- **Principle of security:** The information subject to Processing by the Data Controller or Data Processor must be handled with the technical, human and administrative measures that are

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necessary to provide security to the records, preventing their adulteration, loss, consultation, use or unauthorized or fraudulent access.

- **Principle of confidentiality:** All persons involved in the Processing of Personal Data that are not public must keep the information confidential. Information may only be provided in the exercise of the activities authorized by the Habeas Data legislation.

7. RIGHTS OF THE DATA SUBJECTS

- Know, update and rectify the Personal Data that are kept by Grupo Aval.
- If applicable, request proof of the authorization granted to Grupo Aval to process the Personal Data in its possession.
- Be informed by Grupo Aval of the use it has given to the Personal Data in its possession.
- File complaints with the Superintendence of Industry and Commerce for violations of the provisions of the habeas data legislation mentioned in paragraph 4 of this document.
- Revoke the authorization and/or request the deletion of Personal Data when the Processing, constitutional and legal principles, rights and guarantees are not respected. The revocation and/or suppression shall proceed when the Superintendence of Industry and Commerce has determined that the habeas data legislation mentioned in paragraph 4 of this document has not been observed in the Processing.
- Access the Personal Data that has been subject to Processing, free of charge.

8. DUTIES OF GRUPO AVAL

8.1 As a Personal Data Controller

- The Administration of Grupo Aval is obliged to comply with the provisions of the regulations applicable to the protection of Personal Data
- To guarantee the Data Subject the full and effective exercise of the right of habeas data.
- Request and keep, in any medium, a copy of the authorization granted by the Data Subject when required
- Inform the Data Subject about the purpose of the collection and their rights;
- Keep the information under security conditions that tend to prevent its adulteration, loss, unauthorized or fraudulent consultation, use or access
- Ensure that the information provided to the Data Processor is truthful, complete, accurate, updated, verifiable and understandable
- Update the information, communicating it in a timely manner to the Data Processor and ensuring that it is updated in a timely manner
- Rectify the information when it is incorrect and report this fact to the Data Processor
- Provide the Data Processor with the Personal Data whose Processing is previously authorized, in the cases that are applicable
- Require the Data Processor to comply with minimum security and privacy conditions for the Data Subject's information

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- Process the queries and claims made by the Data Subjects
- Inform the Data Processor when any Personal Data is under discussion by the Data Subject
- If the Data Subject so requires, the Personal Data Controller must inform about the use that has been given to their data
- Ensure the proper processing of Personal Data and include monitoring and control processes to ensure its effectiveness
- Have an area in charge of fulfilling the function of protector of Personal Data, which for these purposes will be the Corporate and Legal Vice Presidency of Grupo Aval
- The Administration will ensure the preparation, modification and updating of this Policy, submit it for approval by the Board of Directors, and verify compliance with it
- The Corporate Legal Vice-Presidency shall periodically inform the Directors on the execution and due compliance with the Personal Data Processing Policy within Grupo Aval
- In the event that a high risk of affecting the right to Personal Data Protection of the Data Subjects is identified, a privacy impact study must be carried out to evaluate the effective operation of the risk management system and internal controls to verify that they are being processed appropriately
- Implement within Grupo Aval a risk management component that allows the identification of vulnerabilities in time and the implementation of risk mitigation measures for both the company and Data Subjects
- Inform the Superintendence of Industry and Commerce of the violation of security codes or the existence of risks in the management of the information of the Data Subjects.

8.2 As a Data Processor

- Guarantee the Data Subject the full and effective exercise of the right of habeas data;
- keep the information under security conditions that tend to prevent its adulteration, loss, unauthorized or fraudulent consultation, use or access;
- update, rectify or delete the Personal Data under its responsibility;
- update the information reported by the Data Controllers within five (5) business days from its receipt;
- process the queries and claims made by the Data Subjects;
- refrain from transferring information that is being disputed by the Data Subject and whose blocking has been ordered by the Superintendence of Industry and Commerce;
- allow access to information to authorized persons; and
- inform the Superintendence of Industry and Commerce of the violation of security codes or the existence of risks in the management of the information of the Data Subjects.

9. PRIVACY NOTICE

To the extent possible, this Policy will be published on the website www.grupoaval.com. In the event that it is not possible to make the Personal Data Processing Policy available to the Data Subject, Grupo Aval must inform the Data Subject about:

- The existence of this Personal Data Processing Policy,

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GRUPO AVAL PERSONAL DATA PROCESSING POLICY

- How to access this document,
- The purpose of the Processing of the Personal Data that is collected, as the case may be,
- Name or company name and contact details of the Data Controller,
- The rights of the Data Subject,

When Personal Data is Sensitive Data, Grupo Aval must inform the Data Subjects that the response to this type of information is optional.

Grupo Aval must keep the Privacy Notice that is used at the time of collecting Personal Data subject to Processing.

In accordance with the regulations governing the conservation of information, Grupo Aval will maintain the support of the authorizations delivered by the Data Subjects during the validity of the relationship that gave rise to the Processing of Habeas Data information, for up to 5 years extendable according to the regulations in force regarding the custody of digital information.

10. AUTHORIZATION

At the time of collection of Personal Data subject to Processing, the prior and informed authorization of the Data Subject must be obtained, for which Grupo Aval must inform:

- The Treatment to which the Personal Data will be subjected.
- The purpose of the collection and processing of Personal Data.
- The optional nature of responding to requests for information on Sensitive Data or Personal Data of minors.
- Its rights as a Data Subject.
- The identification, physical or electronic address and telephone number of the Data Controller.

No activity may be conditioned on the provision of Sensitive Personal Data. The Authorization may be obtained (i) in writing, (ii) orally or (iii) through conduct by the Data Subject that allows concluding that the Authorization was granted. The Authorization may be granted by any means that allows it to be consulted subsequently.

The Data Subject's Authorization will not be necessary in the following events:

- Information requested by a public or administrative entity in the exercise of its legal functions or by court order,
- Public Data.
- Cases of medical or health emergency.
- Processing of information authorized by law for historical, statistical or scientific purposes.
- Data related to the Civil Registry of Persons.

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11. PERSONAL DATA OF MINORS

The Data Processing of minors will ensure compliance with and respect for their rights. Grupo Aval may not Process Personal Data of minors, except in the case of Public Data.

Exceptionally, Personal Data of minors may be Processed when (i) the Processing responds to and respects the best interests of children and adolescents and (ii) respect for their fundamental rights is ensured. In these events, the minor's legal representative must authorize the Processing, for which the minor's opinion must be heard.

12. TYPES OF REQUESTS

Interested Parties

The following are the persons (hereinafter the "Interested Parties") who may be provided with information about the Personal Data held by Grupo Aval:

- The Data Subjects, who must prove their identity.
- Their successors, legal representatives or attorneys-in-fact; who must prove their quality.
- Public or administrative entities in the exercise of their legal functions or by court order;
- Third parties authorized by the Data Subject or by law.

12.1 Updating and/or Consulting Personal Data held by Grupo Aval

The Interested Parties may consult the Personal Data of the Data Subject that is stored in Grupo Aval. For these purposes, the following requirements must be taken into account:

- The consultation must be made in writing and must contain the information of the Data Subject and the contact details of the interested party.
- This must be answered within a maximum term of ten (10) business days from the date of filing.
- When it is not possible to respond to the query within this period, the Interested Party will be informed.
- The term for responding may be extended up to five (5) additional business days, counted from the expiration of the initial term.
- Likewise, interested parties may at any time through the channels available for this purpose or by written communication, request Grupo Aval to update the data provided for this purpose.

12.2 Complaints about issues related to Personal Data in Grupo Aval

The claim will be made by written communication addressed to the Legal Representative of Grupo Aval, which must include the following information:

- Identification of the Data Subject,

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- description of the facts giving rise to the complaint, and
- the contact details of the Interested Party.

The claim will be addressed within a maximum term of fifteen (15) business days from the date of filing. When it is not possible to address the complaint within this period, the Interested Party will be informed. The initial term may be extended for up to eight (8) additional business days, counted from the expiration of the initial term.

If the claim is incomplete, Grupo Aval must inform the Interested Party of this situation, within a maximum period of five (5) business days from the date of filing the claim.

It will be understood that the interested party has withdrawn the claim, if after two (2) months from the date of the request, he does not correct his claim.

In the event that the claim is filed with a collaborator or an entity that is not competent to provide information, it must be forwarded to the competent entity or collaborator within two (2) business days. This information must be reported to the Interested Party.

12.3 Deletion of Personal Data and/or revocation of the Authorization granted for the Processing of Personal Data

The Data Subjects may request the deletion of their Personal Data and/or revoke the authorization granted for the Processing of the same, by submitting a written request that must contain:

- Identification of the Data Subject,
- description of the facts giving rise to the request for deletion of Personal Data and/or the revocation of the Authorization, and
- the contact details of the Interested Party.

The request for deletion of Personal Data and/or the revocation of the authorization granted for the Processing of Personal Data will be addressed within a maximum term of fifteen (15) business days from the date of filing of the claim. When it is not possible to respond to the request within this period, the Interested Party will be informed. The initial term may be extended for up to eight (8) additional business days, counted from the expiration of the initial term. The request for the deletion of information or the revocation of the Authorization will not proceed when there is a legal or contractual duty to remain in the database.

13. AREA RESPONSIBLE FOR PROCESSING REQUESTS, QUERIES, UPDATES, COMPLAINTS, DELETION AND/OR REVOCATION OF AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA.

The area responsible in Grupo Aval to process everything related to requests for information, consultations, updating, complaints, deletion and/or revocation of the authorization for the Processing of Personal Data will be the Corporate Legal Vice Presidency through which the requests will be coordinated with the respective areas within the company:

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Contact: Corporate Legal Vice Presidency

Address: Carrera 13 No. 26A-47. 23rd floor. Banco de Occidente Building

email: jrincon@grupoaval.com or jarias@grupoaval.com

Telephone: +57 (601) 7433222

14. SECURITY OF DATABASES AND/OR FILES CONTAINING PERSONAL DATA

The Databases and/or files containing Personal Data that Grupo Aval may have from time to time and which the company Processes, must have the technical, human and administrative measures necessary to provide security and confidentiality to the records, in accordance with the provisions of the Information Security Model and the applicable regulations.

In the event that Grupo Aval, in accordance with the purposes authorized by the Data Subjects, processes the Personal Data information for second uses in accordance with the procedures established in this document, it will publish the percentage of the information that was subject to such processing.

15. DISSEMINATION OF THE PERSONAL DATA PROCESSING POLICY

In accordance with the applicable regulations, Grupo Aval must disseminate its Personal Data Processing Policy, through its website, where the Personal Data Processing Policy document published on the www.grupoaval.com website will be published.

16. NON-COMPLIANCE

Grupo Aval requires strict compliance with the Habeas Data regulations and the provisions of this Policy for all its employees and suppliers. Any action or omission that contravenes these provisions will result in disciplinary measures such as: verbal and written warnings and contractual suspensions. In the same sense, sanctions may be imposed that are found in current legislation, in the internal regulations and codes of Grupo Aval and the breaches established by the commercial contracts signed.

This policy applies to all employees, contractors, suppliers and third parties who, within the framework of their functions or contractual relationships, have access to or intervene in the processing of personal data under the responsibility of Grupo Aval.

17. FORMS AND ANNEXES

The following form is part of this document:

- F-Talento-8: Authorization for the processing of personal data of candidates in selection processes.

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CHANGE CONTROL

PUBLICATION DATE	DATE AND MINUTES OF THE MEETING	VERSION	REASON FOR CHANGE LAST UPDATED
09-09-2025	Minutes #472 June 18, 2025	2	General review of the document

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