

PERSONAL DATA PROCESSING POLICY

Dr. Mauricio Serrano, MD.

ID:

Medical License:

Bogotá, D.C., Colombia

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1. Introduction

In accordance with Law 1581 of 2012, Decree 1377 of 2013, and other related regulations, this Personal Data Processing Policy regulates the collection, storage, use, circulation, and/or deletion of personal data processed by Dr. Mauricio Serrano (hereinafter, the “Controller”), in the exercise of his professional activities as a medical surgeon in the field of healthcare in Bogotá, D.C., Colombia. This policy aims to ensure the protection of the fundamental rights of data subjects, particularly the right to privacy and intimacy, within the framework of providing medical services, diagnosis, treatment, and follow-up offered by the Controller.

2. Scope and Definitions

2.1 Scope

This policy applies to all personal and sensitive data collected by the Controller, whether from adult or minor patients in the context of providing medical services, as well as data collected through the website and/or social media for administrative, commercial, or advertising purposes, always with the explicit authorization of the data subject or their legal representative.

2.2 Definitions

- **Personal Data:** Any information linked to or that can be associated with an identified or identifiable natural person.
- **Sensitive Data:** Information that affects the privacy of the data subject or whose improper use may lead to discrimination, such as health data, biometric data, or images.
- **Data Subject:** Natural person whose personal data is subject to processing.
- **Controller:** Dr. Mauricio Serrano, who is committed to the proper processing of personal data of his patients and users and determines the purposes and means of data processing.
- **Authorization:** Prior, express, and informed consent of the data subject to carry out the processing of their data.

3. Principles

The Controller adheres to the following principles established in Law 1581 of 2012:

- **Legality:** Personal data processing is carried out in accordance with the Political Constitution of Colombia, Law 1581 of 2012, and other applicable regulations. Data cannot be collected or processed outside the legal framework.
- **Purpose:** The collection and processing of personal data are carried out for legitimate, clear, specific, and previously informed purposes. Data will not be used for purposes other than those authorized.
- **Freedom:** Personal data processing can only be carried out with the free, prior, express, and informed consent of the data subject or their legal representative.
- **Truthfulness or Quality:** The information subject to processing must be truthful, complete, accurate, updated, verifiable, and understandable. Processing of partial, incomplete, fragmented, or misleading data is prohibited.
- **Security:** Reasonable technical, human, and administrative measures are adopted to protect personal data and prevent its alteration, loss, unauthorized or fraudulent access, or use.
- **Confidentiality:** Individuals involved in personal data processing are obligated to ensure the confidentiality of the information, even after their relationship with any of the tasks involved in the processing has ended.

4. Purposes of Data Processing

4.1 Patient Data

Public, semi-private, and sensitive personal data of patients, including health data, are processed for the following purposes:

- **Medical Care and Treatment:** Data will be used for scheduling appointments, making diagnoses, conducting treatments and follow-ups, and communications related to surgical, non-surgical, and/or medical device services, as applicable in each case.
- **Administrative Management:** Data will be used for administrative purposes, including appointment scheduling, document management (medical records, informed consents, etc.), and billing for services provided.
- **Advertising:** With the data subject's explicit authorization, collected data may be used to send advertising information, promotions, or to publish images and testimonials on the website www.drmauricioserrano.com, social media, or other official media. This use will respect the dignity of the data subject and exclude minors.
- **Simulations of Medical or Aesthetic Treatments:** With the explicit authorization of the data subject and/or their legal representative, images or videos may be used for simulations of medical or aesthetic treatments through 3D modeling tools, always ensuring respect for the data subject's dignity.
- **Research:** Data may be used for medical studies or research, provided the data is anonymized when necessary to protect the data subject's privacy and comply with applicable research regulations.

- **Legal Obligations:** Data will be processed to comply with requirements from health, tax, or judicial regulatory authorities, in accordance with applicable legal and regulatory standards.
- **Compliance with Regulations and Service Improvement:** Data may be used to ensure compliance with health regulations and for internal analysis to improve provided services, ensuring personalized and efficient care.
- **Customer Service and Support:** Data will be used to provide assistance and support to users, whether through direct contact, chatbots, or automated systems, to enhance patient interaction.
- **Sending Health-Related Communications:** With explicit consent, data may be used to send reminders, follow-up notifications, or information about the data subject's health status, as well as recommendations regarding their treatment or additional available services.

4.2 Website User Data

Personal data collected through our website will be used for the following specific purposes:

- **Management of Appointments, Consultations, and Medical Procedures:** To coordinate and manage medical appointments, follow up on consultations and procedures, and ensure the proper provision of medical services offered by the Controller.
- **Sending Communications Related to Treatment or Services:** We will use your data to inform you about your medical treatment, health updates, appointment reminders, and other related services, always with your prior and express consent. This includes electronic messages, such as emails and notifications.
- **Compliance with Legal Obligations and Service Improvement:** We collect and process your personal data to comply with applicable legal regulations, such as health, safety, and privacy regulations. Additionally, your data will be used to continuously improve our services, analyze the quality of care, and facilitate website optimization.
- **Customer Service and Support:** To respond to questions, comments, or requests made through the contact form or via chatbot and/or online assistance platform offered on the website.
- **Personalization of User Experience:** To tailor our services to your specific needs, ensuring that navigation and interactions are as relevant and useful as possible for you.
- **Advertising:** With the data subject's explicit authorization, data collected through the chatbot may be used to send advertising information and/or promotions about the services offered.
- **Research and Development:** To conduct internal analyses that allow us to improve our processes and services, ensuring we stay up-to-date with medical and technological advancements.

5. Data Subject Rights

Data subjects have the following rights:

- Access their processed personal data free of charge.
- Update or rectify their personal data when it is inaccurate or unauthorized.
- Request proof of the authorization granted for the processing of their personal data.
- Revoke the authorization granted or request the deletion of their data, except in cases where legal obligations prevent it.
- Refrain from providing sensitive data or data of minors, except when necessary for performing requested medical procedures and/or treatments.
- File complaints with the Superintendency of Industry and Commerce when they believe their data is being used unlawfully.

6. Processing of Minors' Data

The processing of minors' data is carried out only with the express authorization of their legal representative, prioritizing the best interests of the minor in accordance with Law 1098 of 2006. When applicable, the adolescent's assent will be considered based on their age and maturity. Authorization will not be requested, nor will images or videos of minors be published in any media under any circumstances.

7. Authorization MAURICIO SERRANO

Data processing requires the prior, express, and informed authorization of the data subject or their legal representative, obtained through authorization forms designed for patients (adults and minors) and website users. Authorization for the use of images or videos for commercial or advertising purposes will be specific and will not apply to minors under any circumstances.

8. Security Measures

The Controller implements technical, human, and administrative measures to ensure data security. These measures include, but are not limited to:

- Encryption of sensitive data.
- Restriction of access to authorized personnel.
- Periodic training of personnel on data protection.
- Protocols for managing security incidents.
- Physical facility security.
- Minimal data collection.

9. Data Management Using Artificial Intelligence Technologies

We inform you that when using artificial intelligence (AI) processing engines in our services, the data you provide may be processed and temporarily stored by third-party providers that offer technological support for the operation of these systems. These providers comply with strict security and data privacy policies and take appropriate measures to ensure data protection. However, you should be aware that when using these services, your data may be stored on servers beyond our direct control, which entails risks regarding data transmission and storage.

We will make our best efforts to ensure these providers are subject to applicable personal data protection laws in Colombia, but users should note that, despite necessary precautions, absolute security in the storage of data processed through these technologies cannot be guaranteed.

9.1 Responsible Use of Artificial Intelligence and Transparency in Responses

Services involving artificial intelligence, such as our chatbot, are designed to provide automated assistance and respond to frequently asked questions efficiently. However, users should consider the following:

- Responses are generated by an AI system and, while designed to be helpful, may not be entirely accurate, complete, or suitable for all contexts.
- The chatbot does not replace personalized advice from a qualified professional. It is recommended to consult human experts for cases requiring specific or specialized guidance.

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9.2 Scope and Use of the Chatbot

The chatbot is designed exclusively to assist users/data subjects during the appointment scheduling stage. Outside this context, the chatbot is not enabled, does not perform automatic interactions, nor offers additional functionalities.

The chatbot does not request, process, or store sensitive personal data of the data subject, such as health-related information, medical status, biometric data, religious beliefs, sexual orientation, financial status, images, voice recordings, or videos. Its functionality is limited to collecting basic and strictly necessary data for:

- Managing the request for a medical consultation.
- Providing general information related to the scheduling process.
- Guiding the user on additional contact channels or next steps.

All information provided by the user through the chatbot will be treated with strict confidentiality and will be governed by Dr. Mauricio Serrano's Data Processing Policy and applicable personal data protection regulations.

By using the chatbot, the user authorizes the collected data to be used for legitimate commercial purposes, including but not limited to:

- Analysis of user preferences and behavior to continuously improve our services and care processes.

- Audience segmentation to personalize communication experiences.
- Sending promotional or advertising communications, whether by electronic, telephone, or physical means, related to products, services, news, or proprietary campaigns.

The user may, at any time, revoke their consent or request exclusion from receiving commercial communications by following the mechanisms provided in the Data Processing Policy or through available customer service channels.

9.3 Bias and Non-Discrimination

We are committed to ensuring our chatbot operates impartially and equitably. However, as AI systems learn from historical data, there is a risk of unintentionally reproducing biases. To mitigate this:

- We conduct periodic evaluations and tests to identify and correct potential biases in generated results.
- We apply ethical principles in the development and monitoring of the system, promoting equity, inclusion, and respect for diversity.

10. Data Transfer and Transmission

Personal data will not be transferred to third parties without the data subject's explicit authorization or legal mandate. In case of transmission to data processors, data transmission agreements will be signed between the Controller and the processor to ensure data protection and privacy.

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11. Procedure for Exercising Rights

Data subjects may exercise their rights by submitting a written request to the email address drmauricioserrano2016@gmail.com or to the physical address at Carrera 7 Bis A # 123-06, Bogotá, D.C. The request will be processed within a maximum period of ten (10) business days, extendable by five (5) additional days if necessary. Data subjects also have the right to file complaints before the Superintendency of Industry and Commerce.

12. Data Controller

- **Name:** Dr. Mauricio Serrano
- **Address:** Carrera 7 Bis A # 123-06, Bogotá, D.C.
- **Email:** drmauricioserrano2016@gmail.com
- **Phone:** +57 316 6162137

13. Validity

This policy takes effect on June 9, 2025, and will remain in force until modified or replaced. The databases will have a validity equal to the period necessary to fulfill the purposes of the processing, in accordance with current regulations.