



## **POLÍTICA DE INFORMACIÓN**

Aprobada en Junta Directiva de ISA número 831  
29 de mayo de 2020

### **OBJETIVO**

Declarar las decisiones corporativas orientadoras de la gestión de la información y el conocimiento como activos críticos y estratégicos, para el desarrollo de los negocios en sus necesidades presentes y futuras, que requieren ser conservados, protegidos en procura de la sostenibilidad, la construcción de sinergias y la continuidad de la operación de ISA y sus empresas.

### **DECLARACIONES**

- Establecemos mecanismos para salvaguardar la información, cumpliendo la normatividad que regula a ISA y sus empresas, y en especial a aquella que tiene en su línea de negocio alojamiento y servicios de información de terceros, con criterios de disponibilidad, integridad, confidencialidad, transparencia y confiabilidad.
- Damos un tratamiento riguroso a la información confidencial de fuentes internas o de terceros y en especial la de nuestros trabajadores, asegurando el cumplimiento de Habeas Data y la protección de la información personal de nuestros grupos de interés.
- Establecemos estrategias y prácticas para la gestión del conocimiento que permitan capturar, mantener y transferir el saber y la memoria institucional.
- Reconocemos las obras intelectuales, las creaciones e invenciones de nuestros trabajadores y demás activos relacionados con la información y el conocimiento, en tanto que hacen parte de los derechos patrimoniales y propiedad corporativa de ISA y sus empresas.
- Acatamos y respetamos la legislación establecida en materia de Propiedad Intelectual e Industrial, intercambio y administración de la información en cada uno de los países donde tenemos presencia, así como los convenios, acuerdos y tratados que resulten pertinentes y los compromisos voluntarios que ISA y sus empresas hayan contraído.
- Reconocemos los riesgos cibernéticos que pueden atentar contra la seguridad de la información y nos comprometemos a gestionarlos cumpliendo la normatividad vigente, los requisitos exigidos por los clientes y el mercado, capacitando a los empleados de nuestras empresas en esta materia e implementando mecanismos tecnológicos y de procesos para mitigarlos.
- Implementamos mecanismos para mitigar la fuga de información y controlar la forma en que los usuarios la comparten de manera segura. Para ello, restringimos el acceso a sitios de intercambio de archivos y buzones de almacenamiento masivo diferentes a los definidos y limitamos el uso de medios extraíbles como memorias USB o discos externos.
- Asignamos privilegios de usabilidad y acceso a la información, acorde con perfiles, roles y responsabilidades.

- Promovemos la responsabilidad de nuestros trabajadores con la gestión de la información y el conocimiento, asegurando el cumplimiento de los criterios definidos y la mejora continua.

## **ROLES Y RESPONSABILIDADES**

- Todos los colaboradores de la organización son responsables de la aplicación de esta política en su ámbito de actuación acorde con los modelos de gestión, normatividad interna y protocolos definidos para tal fin.
- Cada empresa del grupo es responsable de manera integral de valorar, clasificar y determinar el tratamiento de la información considerando entre otras sus características de confidencialidad, integridad y disponibilidad. Adicionalmente debe gestionar los riesgos asociados con la protección de la información y el conocimiento en el marco del modelo corporativo.

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**OLGA LUCÍA LÓPEZ MARÍN**

**VICEPRESIDENTE TECNOLOGÍA DE INFORMACIÓN**

## Certificado de finalización

ID de sobre: 3F682B1254B343868612131D88A08FB2

Estado: Completado

Asunto: Aplicar DocuSign a: Política Información.pdf

Sobre de origen:

Páginas del documento: 2

Firmas: 1

Autor del sobre:

Páginas del certificado: 4

Iniciales: 0

MARIA ADELAIDA ESCOBAR HURTADO

Firma guiada: Activado

Calle 12 sur N° 18 - 168 Bloque 1

Cuña de la identificación del sobre: Activado

Medellín, Antioquia 050022

Zona horaria: (UTC-05:00) Bogotá, Lima, Quito, Rio Branco

mescobar@isa.com.co

Dirección IP: 181.132.133.248

## Seguimiento de registro

Estado: Original

Titular: MARIA ADELAIDA ESCOBAR HURTADO

Ubicación: DocuSign

08/07/2020 10:11:21

mescobar@isa.com.co

### Eventos de firmante

### Firma

### Fecha y hora

Olga Lucia Lopez Marin

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Enviado: 08/07/2020 10:48:07

Olopez@isa.com.co

Visto: 08/07/2020 11:24:01

Nivel de seguridad: Correo electrónico,

Autenticación de cuenta (ninguna)

Adopción de firma: Dibujada en dispositivo

Utilizando dirección IP: 181.136.100.162

Firmado con un dispositivo móvil

Firmado: 08/07/2020 11:43:23

### Información sobre confidencialidad de registros y firmas electrónicos:

Aceptado: 08/07/2020 11:24:01

ID: 46fba473-a311-4ebf-a3dc-7017f189a119

### Eventos de firmante en persona

### Firma

### Fecha y hora

### Eventos de entrega al editor

### Estado

### Fecha y hora

### Eventos de entrega al agente

### Estado

### Fecha y hora

### Eventos de entrega al intermediario

### Estado

### Fecha y hora

### Eventos de entrega certificada

### Estado

### Fecha y hora

### Eventos de copia oculta

### Estado

### Fecha y hora

### Eventos del testigo

### Firma

### Fecha y hora

### Eventos de notario

### Firma

### Fecha y hora

### Eventos de resumen de sobre

### Estado

### Marcas del tiempo

Sobre enviado

Con hash/cifrado

08/07/2020 10:48:07

Certificado entregado

Seguridad comprobada

08/07/2020 11:24:01

Firma completa

Seguridad comprobada

08/07/2020 11:43:23

Completado

Seguridad comprobada

08/07/2020 11:43:23

### Eventos de pago

### Estado

### Marcas del tiempo

## Información sobre confidencialidad de registros y firmas electrónicos

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