

PERSONAL DATA PROCESSING POLICY

1) PURPOSE AND SCOPE.

This Policy for the Processing of Personal Data (hereinafter, the “Policy”) is issued so that the Processing of Personal Data is carried out by the Company in strict compliance with Decree 1377 of 2013, Law 1074 of 2015 and Law 1581 of 2012 and other regulations that modify or add them (hereinafter the "Law"), allowing natural persons whose Personal Data is subject to processing (hereinafter, the "Owner" or "Owners") to know their rights and how to exercise them (hereinafter, the “Processing”).

This Policy refers the established and domiciled Colombian branches of the Gran Tierra Energy group collectively as the “Company”; which may be updated from time to time and currently means the following entities:

Corporate Name	NIT
Gran Tierra Energy Colombia GmbH Sucursal Colombia	860.516.431-7
Gran Tierra Operations Colombia GmbH Sucursal	900.335.237-1
Gran Tierra Energy Resources Inc Sucursal Colombia	901.288.190-6
Petrolifera Petroleum (Colombia) Limited	900.139.306-1
Gran Tierra Energy (Africa) GmbH Sucursal Colombia	830.093.262-2

2) RESPONSIBLE.

Corporate Name: Gran Tierra Energy Colombia GmbH Sucursal Colombia
 Nit: 860.516.431-7
 Address: Calle 113 No. 7-80 Piso 17
 City: Bogotá
 E-mails: col.datospersonales@grantierra.com
 Phone: 6585757
 Website: https://www.grantierra.com/es/
 Areas in Charge: Data Protection Officer
 Data Protection Officer: Director Legal, Regulatory & Contracts

3) PERSONAL DATA SUBJECT TO PROCESSING

The personal data of the Owner susceptible to Processing by the Company are, among other, but not limited to: names, surnames, date and place of birth, nationality, type and number of identity document (citizenship card, driving license, military card, professional card, passport), fingerprints, sex, profession,

occupation or trade, marital status, family data, address, email, telephone numbers (landline and cell phone), types and numbers of financial products, and any other information considered personal data (hereinafter, "Personal Data").

4) PROCESSING OF SENSITIVE DATA:

Sensitive data is construed to be data that affects the privacy of the Owner or whose improper use may lead to discrimination, such as data that reveals racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions, social or human rights organizations, or of those that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties as well as data related to health, sexual life and biometric data.

The Processing of sensitive data is prohibited, except when: a) the Owner has given explicit authorization to said Processing, except in cases where the granting of said authorization is not required by law, and b) the Processing is necessary to safeguard the vital interest of the Owner and the Owner is physically or legally incapacitated. In these events, legal representatives must grant their authorization.

4.1. SPECIAL AUTHORIZATION OF SENSITIVE PERSONAL DATA

The Company will inform all the Owners, through the various means to obtain authorization, that by virtue of Law 1581 of 2012 and regulatory provisions, the Owners are not required to grant authorization for the Processing of sensitive data. In the case of Processing related to health, the Company will implement the necessary measures to protect the confidentiality of the information. The purpose of the sensitive biometric data processed is the identification of people, as well as the security, the compliance with legal obligations and the adequate provision of Services.

4.2. RIGHTS OF BOYS, GIRLS AND ADOLESCENTS

The Processing of Personal Data of children and adolescents is prohibited, except when it concerns data of a public nature, and when said processing meets the following parameters and/or requirements:

- That it responds to and respects the best interests of children and adolescents.
- That respect for their fundamental rights is ensured.

Once the above requirements have been met, the legal representative of the children or adolescents may grant authorization, after the minor has exercised his or her right to be heard, an opinion that will be valued taking into account maturity, autonomy and ability to understand the matter.

5) PROCESSING TO WHICH PERSONAL DATA WILL BE SUBJECTED.

The Company will carry out the Processing of Personal Data to comply with its corporate purpose and the obligations under its charge, which includes its collection, storage, administration, use, transfer, transmission and destruction.

The Company guarantees to the Owners its compliance with the duties set forth in the Law regarding the Processing of their Personal Data, which include, without limitation, guaranteeing the Owner his/her full and effective right of habeas data; and to preserve the information under the security conditions necessary to prevent its adulteration, loss, unauthorized or fraudulent consultation, use or access.

If Personal Data is provided by its Owner, said information will be used only for the purposes herein stated.

The Processing refers to Personal Data of employees, suppliers, clients and third parties with whom the Company has a direct or indirect relationship, which may need to be transmitted or transferred to: (i) its parent companies, subsidiaries and/or subordinates located in Colombia or abroad for the eventual management thereof in corporate databases, (ii) third parties in compliance with contractual obligations, which will be carried out in strict compliance with the legal obligations applicable, (iii) authorities at their express request, (iv) third parties on the occasion of a merger, consolidation, acquisition, divestiture, or other restructuring process of the Company; or (v) whenever required or permitted by law.

The Processing of Personal Data of Owners with an employment relationship is required prior to the beginning of any employment relationship, by virtue of any selection process carried out by the Company, during the employment relationship and after its termination, and its purpose is to facilitate the identification of the employee, the compliance with labor and tax obligations borne by the Company such as payroll payments, payments and reports to the general social security system, attention to queries, requests, petitions, actions and claims, made by the Owner of the information, by their legal representatives or by judicial entities or by entities of the general social security system in which the Owner is or has been enrolled.

The Processing of Personal Data of Owners that are suppliers, customers and third parties is required prior to the start of the commercial relationship by virtue of any know - your - counterparty or enrollment process in respect of the Owner, for as long as the relationship lasts and even after it has ended, to facilitate the compliance with the Company's corporate purpose and the additional and complementary activities, the contractual obligations for which the Company is liable, such as the payment of fees, payment reports, reports, management or interactions that by law or by internal policies it is obliged to carry out, attention to queries, petitions, requests, actions and claims made by the Owner of the information or by his or her legal representatives.

The Company may subcontract third parties for the processing and handling of certain functions or information of this Policy. When the processing and handling of Personal Data is subcontracted to third parties or Personal Data is provided to third party service providers, the Company will warn said third parties about the obligation to protect said Personal Data with adequate security measures as well as of the prohibition to use such data for its own purposes and to disclose personal data to third parties.

The Company will keep the Personal Data subject to Processing for the term for which the law imposes the obligation to keep and custody files, depending on the nature of the data.

6) OWNERS' RIGHTS.

The Owners of Personal Data being Processed may exercise, in accordance with Law 1581 of 2012, the following rights:

- a) To know, update and rectify their Personal Data. This right may be exercised, among other things, against partial, inaccurate, incomplete, fragmented, misleading data, or data whose Processing is expressly prohibited or has not been authorized.
- b) To request proof of the authorization granted except when it is not required in accordance with the provisions of article 10 of Law 1581 of 2012.
- c) To be informed, upon request, of the use that has been made of their Personal Data.
- d) To file complaints to the Superintendency of Industry and Trade for the breach of the provisions of the law and this Policy.

- e) To revoke the authorization and/or to request the deletion of the data when the Processing does not respect the constitutional and legal principles, rights and guarantees, provided that there is no legal or contractual duty that prevents the deletion thereof.
- f) To access, free of charge, their Personal Data that has been processed.
- g) To refrain from answering questions about sensitive data. Responses that deal with sensitive data or data on girls, boys and adolescents will be optional.

7) DUTY TO INFORM THE OWNER

The Company will inform the following in a clear and express manner:

- a) The Processing to which their Personal Data will be subjected and the purpose thereof.
- b) The optional nature of the response to the questions asked, when they relate to Sensitive Data.
- c) The rights that assist them as Owners.
- d) The identification, physical or electronic address and telephone number of the person Responsible for the processing.

8) PROCEDURE FOR EXERCISE OF RIGHTS BY OWNERS.

a) Queries: The Owners or their successors can send their queries to the email: col.datospersonales@grantierra.com which must be answered by the Company no later than ten (10) business days after the date it was received. When it is not possible to comply with this time, the interested party will be informed of the reasons for the delay and the date on which the query will be answered, which must be no more than five (5) business days after the day following the expiration of the first term.

When the query is not understood or does not meet the necessary requirements to allow the Company to give an answer, the Company will inform the Owner or the successor in title so that he or she can submit the query again no later than within five (5) business days following the request. If the Owner does not submit the required information after fifteen (15) days from the date of the request, it will be construed by the Company that the Owner or successor in title has desisted.

b) Claims: The Owner or successor in title who considers that the information contained in a Company database must be corrected, updated or deleted, or when he or she notices that the Company has breached its duties, may file a claim which will be processed under the following rules:

- i) The claim will be made by sending a request to the email col.datospersonales@grantierra.com with the identification of the Owner, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert. If the claim is incomplete, the Company will require the interested party to correct the deficiencies within five (5) days following receipt of the claim. After two (2) months from the date of the request, without the applicant presenting the required information, it will be construed that he has withdrawn the claim.

ii) Once the full claim is received, a legend that says "claim in process" and the reason thereof will be included in the database within a period of no more than two (2) business days. Said legend must be maintained until the claim is decided.

iii) The maximum term to address the claim will be of fifteen (15) business days counted from the day following the date of receipt. When it is not possible to address the claim within said term, the interested party will be informed of the reasons for the delay and the date on which their claim will be answered, which cannot be more than eight (8) business days following the expiration of the first term.

iv) In the event that the claim refers to deletion of data, if the Company does not delete the data within the aforementioned terms, the Owner has the right to request the Superintendence of Industry and Trade to order the revocation of the authorization and /or the deletion of the Personal Data.

v) The Owner or successor in title can only file a complaint with the Superintendence of Industry and Trade when he / she has exhausted the direct query or claim process with the Company

Notwithstanding the foregoing, the Personal Data must be kept by the Company when it is required to comply with a legal or contractual obligation.

9) TERM:

This Policy for the Processing of Personal Data applies as of July 26, 2013. The databases in which Personal Data will be recorded will be valid for a term equal to the time in which the information is kept and used for the purposes described in this Policy. Once these purposes are met and as long as there is no legal or contractual duty to keep your data, your data will be deleted from our databases.

This Policy and any substantial change in the data processing policies will be announced in our website <https://www.grantierra.com/es/>.

Version	Publication Date	Subjects Included
1.0	26/07/2013	Initial Publication
1.1	09/05/2024	Verification, with no substantial changes