



**CERTIFIED
ELECTRONIC
SIGNATURE POLICY**



	CERTIFIED ELECTRONIC SIGNATURE POLICY	OID:	1.3.6.1.4.1.31304.1.2.11.8
		Effective Date:	16/02/2026
		Version:	8
		Classification of information:	Public
		Elaborated:	Chief Operating Officer
		Reviewed:	Policy and Safety Committee
		Approved:	General Manager

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Introduction

ANDES SCD is an Open certification entity accredited by the Regulatory Body, National Accreditation of Colombia ONAC to provide its digital certification services in Colombian territory and in accordance with current Colombian regulations. This policy associated with the certified electronic signature service contemplates the provisions established in the Statement of Certification Practices and describes the set of rules defined by the Andes SCD certification authority for the use of the service by customers.

1. Presentation of the document

This document brings together the Certification Policy for the Certified Electronic Signature service that describes the operation of the service and in general the conditions of use, obligations and responsibilities of the parties involved, this document is complementary to the Statement of Certification Practices.

1.1. Document Name and Identification

Document	Certified Electronic Signature Policy
Description	This document presents the policies of the ANDES SCD Certification Authority regarding the operations and procedures used to support the service of the certified electronic signature in compliance with current regulations.
OID Identifier	1.3.6.1.4.1.31304.1.2.11.8
Version	V 8
Date of issue	January 30, 2026
Location	https://andesscd.com.co/docs/Politica_Firma_Electronica_Certificada.pdf

1.2. References

The provision of the certified electronic signature service is carried out in accordance with the provisions established in Law 527 of 1999, Decree 019 of 2012 (Article 161), Decree 2364 of 2012, Decree 333 of 2014 and other regulations that modify or complement them.

The content of this Certification Policy was prepared taking into account the

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recommendations of the following standards: RFC 3647, RFC 5126, ETSI 319 142 April 2016, RFC 6238 May 2011, RFC 5652.

1.3. Policy management

The content of this Certification Policy is managed by the Policy and Safety Committee in charge of its preparation, registration, maintenance and updating. Below are the details of the policy and safety committee and a contact person available to answer questions regarding this document.

1.3.1. Organisation administering this document

Name : Policy & Safety Committee
Address : Calle 26 #69c-03 Torre B oficina 701.
Email : comite.politicas.seguridad@andesscd.com.co
Phone : PBX (601) 241 55 39

1.3.2. Contact person

Company name : ANDES Servicio de Certificación Digital S.A SIGLA ANDES SCD SA.
Name : Sandra Cecilia Restrepo Martínez – General Manager
Address : Calle 26 #69c-03 Torre B oficina 701.
Email : info@andesscd.com.co
Phone : PBX (601) 241 55 39

1.3.3. Policy approval procedures

The Natural Person Certification Policy is administered by the Policy and Safety Committee and is approved by the General Management of Andes SCD.

1.3.4. Publication of the document

The Natural Person Certification Policies and the Statement of Certification Practices are documents for public use that are available on the Andes SCD website. Any modifications to these documents are published immediately maintaining a version history.

1.4. Identification of the Digital Certification Body

Name	Andes Servicio de Certificación Digital S.A.
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Company Name	Andes Servicio de Certificación Digital S.A.
NIT	900.210.800 -1
Chamber of Commerce Registration Number	01774848 of 15 February 2008
Certificate of Existence and Legal Representation	https://www.andesscd.com.co/docs/Certificado_de_existencia_y_representacion_legal.pdf
Registered Office and Correspondence	Calle 26 #69c-03 Torre B oficina 701, Bogotá D.C.
Phone	(601) 241 55 39
FAX	(601) 241 55 39
Email address	info@andesscd.com.co
Address of requests, inquiries and complaints	Calle 26 #69c-03 Torre B oficina 701. Bogota. A.D.

1.5. Scope

This document establishes the standards and rules to be followed by the ANDES SCD Certification Authority in the provision of the certified electronic signature service, stipulates the procedures and the legal regime applied to the members of the trust model.

1.6. Definitions

Term	Description
Electronic Signature	Methods such as: Codes Passwords Biometric data Private cryptographic keys that allow a person to be identified, in relation to a data message, as long as it is reliable and appropriate with respect to the purposes for which the signature is used, taking into account all the circumstances of the case, as well as any pertinent agreement.
Chronological Print	It is a service through which the existence of a data message at a certain point in time can be guaranteed. It allows us to have a temporal reference regarding the creation, modification, sending, receipt of a data

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	message preventing its subsequent modification and linking the Colombian legal time.		
HASH	It is the coded summary that is calculated on a digital object of any size, and that has the property of being associated only with the digital object.		
Coordinated Universal Time (UTC)	It is the time determined by the reference to a time zone.		
Data Message	Information generated, sent, received, stored or communicated by electronic, optical or similar means.		
Applicant:	Any natural person who requests the certified electronic signature service		
Technological neutrality	It is the freedom that the providers of digital certification services have to use the technologies for the provision of all services without restriction other than compliance with the applicable technical and regulatory standards in accordance with CEA 3.0.07		

1.7. List of acronyms and abbreviations

Abbreviated	Description
CPD	Certification Practice Statement
PC	Certification Policy
TSA	Chronological Stamping Authority
DNS	Domain Name Systems
UETA	Uniform Electronic Transactions Act

2. Service Policies

2.1. Certified Electronic Signature Service

The certified electronic signature service is a mechanism of methods such as codes, passwords, biometric data, or private cryptographic keys, which allows the

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identification of a person regulated in Law 527 of 1999 under Decree 2364 of 2012.

The Electronic Signature will be considered reliable for the purpose for which the data message was generated or communicated, if:

1. The signature creation data, in the context in which they are used, correspond exclusively to the signatory user.
2. It is possible to detect any unauthorized alteration of the data message, made after the moment of signing.

2.2. Scope of Application:

The certified electronic signature service provides components that allow documents to be signed using one-time passwords (OTPs).

The component delivered in the certified electronic signatures process provides tools to the user that allow them to ensure that an electronic signature is generated and secured reliably, however, it only allows establishing the existence of the email provided by the user of the service in the process of activating the electronic signature mechanism.

Depending on the component purchased by the customer, the following functionalities can be performed:

- The user can select a document to be signed.
- Electronically sign documents or files and store them wherever the client has them.
- Delivery of documents or files associated with a signing task.
- It keeps the trace of the signatories of an electronic document.
- It allows integration with other customer systems through Web Service and/or development language APIs.

2.2.1 Applicant

This is the person who has requested the Certified Electronic Signature service from ANDES SCD.

2.2.2 Subscriber

The subscriber is the person or entity that has contracted the certified electronic

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signature service of ANDES SCD and has a package available for use.

The subscriber contracts the service by packages or personalized and is assigned a user account with the number of signatures available to use, authenticating with the account data can make requests for the service.

2.2.3. User or accepting third party

It is any user who checks the certified electronic signature, based on trust in ANDES SCD.

3. Request for the certified electronic signature service

The procedure for the delivery of the Certified Electronic Signature service may vary according to the modality and conditions agreed for the provision of the service. ANDES SCD offers the Certified Electronic Signature service in the following modalities:

a) Plan purchased from the self-management portal.

It is the one that is self-managed through the website:

- ✓ Enter the <https://andesscd.com.co/> website
- ✓ Select the Services module, click on Electronic Signature.
- ✓ Choose the plan, electronic signatures and fill out the form.
- ✓ Accept terms and conditions, then make payment
- ✓ The confirmation of activation of the service will be sent to the registered email.

b) Client company

- ✓ Commercial support and survey of technical requirements.
- ✓ Trade agreement
- ✓ Request for the creation of users and client company.
- ✓ Creation of the user and assignment of electronic signature quotas.
- ✓ Sending credentials to the registered email.
- ✓ Delivery of the certified electronic signature service with URL for the client.

c) Deployment of the personalized service:

Delivery of the certified electronic signature service with personalized URL (white label) for the client:

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- ✓ Commercial support and survey of technical requirements.
- ✓ Trade agreement.
- ✓ Provision of brand information and technical configuration.
- ✓ SSL certificate application.
- ✓ Implementation and verification of the service based on brand information and SSL certificate provision.
- ✓ Creation of the user and assignment of electronic signature quotas.
- ✓ Provision and verification of access credentials to the platform.
- ✓ Sending credentials to the registered email.

3.1. Service delivery

3.1.1. Service activation notification

Once the activation of the service has been generated, the subscriber is notified of the credentials for access to the certified electronic signature service. The subscriber acknowledges that once the credentials have been delivered, the service will be understood to have been delivered.

3.1.2. Minutes and contracts

In the self-managed web portal modality, the document that compiles the terms and conditions of service provision are accepted at the time the request is registered and it constitutes the contract that binds the two parties for the provision of the service.

For special projects or agreements, a supply or service provision contract will be signed as appropriate to the scope and structuring of the specific project and the commercial proposal sent to the subscriber.

4. Rights and duties

The Statement of Certification Practices (DPC) lists the rights and duties of the Andes SCD Certification Authority, the applicants, subscribers and other parties that rely on the Certified Electronic Signature service.

5. Subscriber information and personal data

ANDES SCD considers confidential all information that is not expressly classified as public and that does not have the approval of disclosure by the owner of the information.

In accordance with the provisions of Law 1581 of 2012, on the protection of personal

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data and its regulatory Decree 1377 of 2013, the subscriber is informed that the data provided by him will be incorporated into a database, whose ownership falls on ANDES SCD who will be responsible and in turn the person in charge of the processing of said data. which will be treated and used by the organization, for the following purposes:

Development of the contractual relationship: This purpose specifically includes the activities of creating the customer for billing purposes, handling of data for customer contact purposes for service quality purposes, such as the provision of the services themselves, which involves the collection of data that is carried out at the time of the request for the service by the subscriber, and the subsequent study of this by ANDES SCD.

Commercial management: Specifically includes the delivery of information on news regarding the certification sector, legislative developments and any other kind, such as information on events, talks and awareness forums related to the commercial activities of ANDES SCD, as well as information on its products, services and activities.

Operation of the Certified Electronic Signature platform: this purpose specifically includes the activities of registration and creation of users, generation of electronic signatures through authentication factors and attached documents, consultation and generation of traceability of the signing process, other management and administration activities of the platform, the processing mentioned in this purpose may be carried out by the Certification Entity as Data Controller or through a third-party platform operator, who will act as Data Processor under the terms of Law 1581 of 2012.

The subscriber authorizes in a prior express and informed manner the processing of his/her personal data, for the purposes expressed, likewise he/she is informed that in order to exercise any action derived from the right of Habeas Data, such as knowing, updating and rectifying his/her data, he/she can exercise it by sending the email pqs@andesscd.com, or by sending his/her written request to our facilities.

By accepting the terms and conditions of use, the applicant/subscriber authorizes ANDES SCD to store, collect and manage the personal data entered in the electronic form for the request of the service in question, as well as the information provided with the request, where data such as your name, address, telephone number, identity document, etc. e-mail address, which I deliver to this entity, to make the request and acquire the service, as acceptance and provision of the

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same by ANDES SCD.

Likewise, the subscriber expressly declares that he/she has been informed about the personal data processing policies of ANDES SCD, which are published on its website, at [link https://andesscd.com.co/docs/SGI/Politic](https://andesscd.com.co/docs/SGI/Politic%20Tratamiento%20Datos%20Personales.pdf) and that he/she is aware of the channels provided by ANDES SCD to exercise the right of HABEAS DATA over his/her personal information.

He states that he has been previously informed about the effects of the authorization, what it means sensitive data and the other rights and guarantees enshrined in Law 1581 of 2012, such as its regulatory Decree 1377 of 2013 and that he is in full condition to express his will free of defects of consent.

5.1. Scope of Confidential Information

All information that is not considered public by ANDES SCD is considered confidential.

The following information is classified as confidential:

1. Personal information not contained in the issuance of the service
2. Data from third parties who rely on the service.
3. Information on safety, control and audit procedure parameters
- 4. Technical Infrastructure Documentation**
- 5. Security Policy Statement**
- 6. Guiding document of the Key Generation Ceremony and Contingency Plan.**

5.2. Responsibilities to Protect Confidential Information

ANDES SCD personnel who participate in any activity or operation of the Certified Electronic Signature Service are subject to the duty of secrecy within the framework of the contractual obligations contracted with ANDES SCD

5.3. Privacy Plan

The privacy plan to protect information classified as confidential is defined in the [Personal Data Protection](#) Policy and the [Information Security policies](#) include controls to protect and assign each type of information a degree of criticality.

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5.4. Information that is not considered confidential

The following information is classified as public:

- ✓ Certification policies and practices
- ✓ Any information whose publicity is required by law.

6. Limitations of Liability

6.1. Responsibility for the accuracy of the Subscriber's information

The Subscriber assumes all risks for damages that may arise from conduct such as providing false, incomplete, outdated information or impersonating third parties or information.

6.2. Responsibility for service availability

The Subscriber acknowledges and accepts that neither ANDES nor any representative, employee or partner of the same will be responsible for the unavailability that at any time the service may have in events of force majeure, fortuitous event or acts of a third party, however, it undertakes to act diligently to minimize the possibilities of failures or interruptions in the same

Failures caused by the inability or insufficiency of the Subscriber's equipment, or by its lack of knowledge regarding the use of the service, will not be attributable to ANDES in any case and it may not be required to repair any damage.

6.3. Responsibility for the functionality of the service in the Subscriber's infrastructure

Subscriber shall be solely responsible for the provision and payment of costs necessary to ensure the compatibility of the Certified Electronic Signature Service, with respect to its equipment, including all hardware, software, electrical components and other physical or logical components required to access and use the same, including but not limited to telecommunications services, access and connection to the Internet, links, browsers, or other programs, equipment, and services required to access and use the Service.

6.4. Liability for computer crimes

In the event that the Subscriber is a victim of any of the behaviors classified as a crime, by Law 1273 of 2009 (Computer Crimes Law), in its information systems, in its applications and technological infrastructure, in the execution of electronic transactions, or in the access and use of the service, phishing attacks, identity theft,

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Due to negligence in the management and confidentiality of the certified electronic signature service, it will be solely responsible and will remedy the damages that may arise, since it is its obligation to adopt security measures, policies, cultural campaigns, legal instruments and other mechanisms to safeguard the confidentiality and proper use of its certified electronic signature service.

7. Use of certified electronic signatures

The electronic signatures generated within the scope of this policy may be used with any type of document with .pdf length, in accordance with the limitations of use and restrictions derived from this Signature Policy and the provisions of the current legal system.

It guarantees the contact information of the signatory of a document, as well as allows the integrity of the document to be checked, i.e. that the information has not been altered, providing an additional security attribute, such as the integrity of the information.

If the certified electronic signature service is used for a purpose other than that indicated in this document, this act will authorize the Certification Entity to cancel it.

In accordance with the provisions of ARTICLE 2.2.2.47.2. of the DURSCIT Technological neutrality and equal treatment of technologies for electronic signatures, ANDES SCD reserves the right to establish electronic signature mechanisms that are both reliable and appropriate to link the identity of a person with the content of the data message, in any case the electronic signature mechanisms will comply with the definition of Article 7 of Law 527 of 1999.

7.1. Prohibitions on the use of the certified electronic signature service.

The performance of unauthorized operations in accordance with the terms and conditions of use as well as with the Certified Electronic Signature Certification Policies, by third parties or subscribers of the service will exempt the ANDES SCD Certification Authority from any liability for this prohibited use.

- ✓ You may not use certified electronic signatures for uses other than those set forth in the "Permitted Service Uses" and "Service Use Limits" section of this Policy.
- ✓ Any practice contrary to the Colombian legal system.
- ✓ Any practice contrary to the international agreements signed by the Colombian state.
- ✓ Any practice contrary to supranational norms.
- ✓ Any practice contrary to good customs and commercial practices.
- ✓ Any use in systems whose failure may cause: Death, Injury to persons and damage

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to the environment.

- ✓ Uses other than those stipulated in this document are prohibited.
- ✓ The use of the certified electronic signature in environments other than the one provided by Andes SCD is prohibited.
- ✓ Any action that violates the provisions, obligations and requirements stipulated in this Policy is considered prohibited.
- ✓ It is not possible for Andes SCD to issue any assessment on the content of the documents signed by the subscriber, therefore, the responsibility for the content of the message is the sole responsibility of the signatory.
- ✓ Unlawful purposes or operations under any legal regime in the world.
- ✓ ANDES SCD will not be liable for the improper use of the certified electronic signature, caused by the negligence of the subscriber in the management of its access credentials, such as allowing the handling of these by third parties, or failing to comply with the duty of confidentiality necessary to safeguard them from unauthorized or fraudulent access.

8. Commercial Terms of Service

8.1. Validity of the service

The validity of the Certified Electronic Signature service will depend on the plan purchased (monthly or annual) and the special commercial agreements signed with clients, entities or applicants, as well as the conditions applicable to promotional campaigns carried out by ANDES SCD.

During this term, a total number of signatures will be assigned, which must be used within the corresponding period.

Subscription and cancellation processes for self-management portal: When the service is purchased through the web portal, the subscriber selects a plan (monthly or annual) and makes the payment by credit card, authorizing ANDES SCD to make the corresponding automatic debit periodically. This authorization remains in effect as long as the service is active.

In plans under the continuous subscription modality, the assigned quotas are not cumulative between billing cycles, since they correspond to a periodic consumption model associated with each debit.

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You may cancel service at any time prior to the next cut-off date of the billing cycle. Cancellation must be made from the option enabled in your account at least one (1) day in advance. Cancellation will be effective at the end of the period already paid, without additional charges or penalties. If the cancellation is not made within the indicated time, the service will be automatically renewed for the next period.

For more detail, the complete conditions are set forth in the Terms and Conditions of the service.

8.2. Service renewal

Renewal of the service will be understood as the acquisition of a new package of certified electronic signatures once the initially acquired package has been consumed or the validity for consumption of these has been completed.

The renewal of the Certified Electronic Signature service is a normal procedure within the operation of ANDES SCD, the service renewal request will be received and processed as a new service request.

For the self-service portal, it will be automatically debited since a subscription plan is being purchased.

For more detail, these premises are included in the terms and conditions of the service.

8.3. Revocation of service

The revocation consists of the loss of reliability of the service and the permanent cessation of its operation, preventing its use by the subscriber.

8.3.1 Grounds for revocation

- ✓ For security compromise in any reason, manner, situation or circumstance.
- ✓ When the subscriber reports that the service has been compromised or has lost its Confidentiality.
- ✓ Due to the death or supervening disability of the subscriber.
- ✓ When the subscriber has been kidnapped.
- ✓ Loss of capacity or disqualification of the subscriber.
- ✓ For the termination of the subscription contract, in accordance with the grounds established in the contract.

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- ✓ When authorized to revoke service by court or administrative order.
- ✓ For improper handling by the subscriber of the service.
- ✓ When it is proven that the subscriber has committed fraud with its service.
- ✓ By liquidation of the represented legal person that appears in the certified electronic signature service.
- ✓ For the breach of the subscriber or the legal entity it represents or to which it is linked through the Digital Certification Service Contract provided by the ECD
- ✓ Due to the occurrence of new facts that cause the original data not to correspond to reality.
- ✓ When the security of the CA private key has been compromised;
- ✓ When the security system of the certification authority has been breached
- ✓ When there are failures in the certification body's system that compromise the provision of the service;
- ✓ When the encryption systems lose validity because they do not offer the level of security contracted by the subscriber.

8.4. Service fees

The rates indicated herein are reference values and may vary according to special commercial agreements signed with clients, entities or applicants, or in the development of promotional campaigns carried out by ANDES SCD.

Concept	Quantity	Monthly Value	Annual Value
Basic	50 signatures	\$91,892	\$ 937,296
Standard	100 signatures	\$155,509	\$ 1,586,194
Corporate Lite	250 signatures	\$ 353.4300	\$ 3,604,986
Corporate Pro	600 signatures	\$763,409	\$ 7,786,770

Note:
rates

All the

presented above are values before VAT.

The above rates may be increased at any time by ANDES SCD, based on the CPI and market conditions, in any case the rates in force at the time of contracting the service will be previously informed to the subscriber through the web portal or the commercial proposal as appropriate.

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8.5. Refund Policy

As stipulated in the Andes SCD Statement of Certification Practices.

8.5.1 Inadmissibility of the refund request

As stipulated in the Andes SCD Statement of Certification Practices

9. Computer security controls.

The controls stipulated in the Digital Certification Practice Statement (DPC).

10. Cessation of ECD activities

The Statement of Certification Practices (CPP) describes the procedures for notification and termination of the CA or RA

11. Corrupted computer resources, software, and data

If any of the computer resources, software or information critical for the provision of the certification service fails or is altered, the recovery procedure established in the Business Continuity Plan or incident management procedure will be followed, as the case may be.

At the same time, an audit is carried out to determine the origin of the problem and the relevant measures are taken to prevent it from happening again.

12. Procedures for managing incidents

The procedure for managing incidents is set out in the Statement of Certification Practices.

13. Dispute Prevention and Resolution

ANDES SCD has a procedure for the treatment of any request, complaint, claim, and suggestion in relation to the provision of the digital certification service or in matters of personal data protection and impartiality. This procedure applies to all processes responsible for the provision of services of Andes SCD S.A., learn about our PQRSF procedure on our website <https://andesscd.com.co/pqrsf/>

14. Principle of impartiality and non-discrimination

In relations with clients, whatever their nature, size, quality, as well as in the provision of ANDES SCD's services, it will act in accordance with the principles defined in the Policy of Impartiality, Integrity and Independence

	CERTIFIED ELECTRONIC SIGNATURE POLICY	OID:	1.3.6.1.4.1.31304.1.2.11.8
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		Classification of information:	Public
		Elaborated:	Chief Operating Officer
		Reviewed:	Policy and Safety Committee
		Approved:	General Manager

https://andesscd.com.co/docs/SGI/politicas_de_imparcialidad_integridad_e_independencia.pdf. and in the Andes SCD Statement of Certification Practices.

15. Termination or Cancellation of Service

The following shall be grounds for termination of the provision of the certified electronic signature service:

- ✓ When there is no extension or contracting of new certified electronic signature services.
- ✓ The unilateral declaration of any of the parties with the time of notice stipulated contractually, which must be communicated in writing sent to the address informed by each of the parties at the time of signing the terms and conditions.
- ✓ Failure to comply with the obligations contained herein, the Certification Practice Statement, and the terms and conditions.
- ✓ The occurrence of any of the causes for cancellation of the certified electronic signature service due to the fault or due to the conduct of the SUBSCRIBER.
- ✓ If ANDES SCD reasonably establishes that the SUBSCRIBER has violated the rights of third parties with the use of the certified electronic signature.

SANDRA CECILIA RESTREPO MARTINEZ
General Manager

16. Change Control

Version	Date	Detail	Responsible
1.0	04/07/2023	Initial version of the document	Policy and Security Committee
2.0	23/08/2023	<ul style="list-style-type: none"> - The introduction of the document has been updated. - The name of the service is 	Policy and Security Committee



CERTIFIED ELECTRONIC SIGNATURE POLICY

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		<p>standardized as a certified electronic signature.</p> <ul style="list-style-type: none"> - The scope of application of electronic signatures is adjusted. - Applicable regulations are updated. - Phone number is updated. 	
3.0	16/11/2023	<ul style="list-style-type: none"> - Updating the OID, the Document Version - Inclusion Definition of Technological Neutrality - Inclusion of taking advantage of the Technology Neutrality policy - The term of cessation of activities of the ECD is included. 	Policy & Safety Committee / Chief Operating Officer / Senior Analyst SGI
4.0	19/02/2024	<p>OID and Version Updated</p> <ul style="list-style-type: none"> - Rates are updated. - The email for the item Inadmissibility of the refund request is updated. 	Policy & Safety Committee / Chief Operating Officer / SGI Professional
5.0	07/05/2024	<ul style="list-style-type: none"> - OID and Version Updated - The procedure for requesting and delivering the service is unified according to the modality. - The description of the items rights and duties, refund policy and inadmissibility of the refund request is modified. 	Policy & Safety Committee / Chief Operating Officer / SGI Professional
6.0	06/06/2024	<ul style="list-style-type: none"> - OID and Version Updated - The Document Name and ID item is updated. - The item principle of impartiality is updated to include the term Non-Discrimination. - The description of the 	Political and Security Committee/ Director of Operations/Proces s Coordinator/ SGI Professional



**CERTIFIED ELECTRONIC
SIGNATURE POLICY**

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		presentation item of the document is updated.	
7.0	24/01/2025	<ul style="list-style-type: none"> -The logo and cover page of the document are updated in accordance with the corporate brand manual. -The OID, Version, and Date of the document are updated. -The Document Name and ID item is updated. -Service rates are updated. -The items validity and renewal of the service are updated. 	<p>Political and Security Committee/ Director of Operations/Operations Coordinator/SGL Professional</p>
8	30/01/2026	<ul style="list-style-type: none"> - Updating the OID, version, and date of the document. - Updating of service rates. 	<p>Policy & Safety Committee / Chief Technology Officer / Chief Operating Officer / SGL Coordinator</p>