



POLICIES AND PROCEDURES APPLICABLE TO THE PROCESSING OF PERSONAL DATA

CORPORACIÓN EDUCATIVA LOS ALCAPARROS, a non-profit entity, established in accordance with the laws of the Republic of Colombia, with legal status recognized by Resolution No. 316 of June 8, 1992, issued by the Mayor's Office of Bogotá, identified with NIT 800.167. 916-0 (hereinafter the "Corporation"), owner of the private educational establishment called COLEGIO HACIENDA LOS ALCAPARROS, with an Operating License granted by Resolution No. 2394 of June 28, 2004 issued by the Secretary of Education of Cundinamarca (hereinafter the "School");

In compliance with the provisions of the Statutory Law 1581 of 2012 and the Regulatory Decree 1377 of 2013, has prepared the following internal policies aimed at the proper treatment and administration of personal data that have been collected and stored in its database.

This document seeks to socialize and disseminate these policies among all members of our community, which includes all persons involved and/or related to the educational, social, recreational and cultural activities developed by the Corporation.

Therefore, the policies provided herein shall be applicable to students, parents, users of the sports facilities, lecturers, affiliates, officials, employees, directors, associates, members of the School Government bodies and other natural persons who are involved or become involved in any way with the Corporation.

1. RIGHTS OF THE HOLDERS OF PERSONAL DATA

The persons who are owners and/or holders of the personal data that have been provided to us have the following rights:

(a) To know, update and/or rectify their personal data, by means of a request sent to the person responsible for or in charge of the processing of such information. This right may be exercised, among others, against partial, inaccurate, incomplete or fractioned data, misleading or those whose treatment is expressly prohibited or has not been authorized.

Note: Performance evaluations, academic work, results reports, report cards and other data used by the Corporation and/or the School to record student performance may not be modified and/or altered, except in those cases in which the owner of the information proves that such information was misfiled or processed with errors.

b) Request proof of the authorization granted to the data controller, except in those cases in which such authorization is not necessary in accordance with the provisions of Article 10 of Law 1581 of 2012.

c) To be informed by the data controller and/or data processor, upon written request, regarding the use made of their personal data.

d) File before the Superintendence of Industry and Commerce complaints or claims for violations committed by the Corporation, to the provisions of Law 1581 of 2012 and other rules that modify, add or supplement it.

e) To revoke the authorization and/or request the deletion of the information contained in the Corporation's database, when the constitutional and legal principles, rights and guarantees are not respected. The revocation and/or suppression will proceed when the Superintendence of Industry and Commerce has determined that, in the treatment, the responsible or in charge have incurred in conducts contrary to the Law and the Constitution.

Note: Under no circumstances will information related to performance evaluations, academic work, results reports, report cards and other data used by the Corporation to record the performance of students be deleted or suppressed.

f) Access free of charge to the personal data that have been processed and of which he/she is the exclusive owner.

POLICIES AND PROCEDURES APPLICABLE TO THE PROCESSING OF PERSONAL DATA

2. PROCEDURES

2.1. With respect to the collection of data and information

The Corporation, in the development of its corporate purpose, permanently collects personal data of those persons who have some kind of relationship with the entity. The most significant cases and examples of this work are:

- The data of parents and students of the school. This data is collected with the purpose of identifying them and maintaining a pedagogical relationship with them.

The signature of the Enrollment Contract by the parents and/or student indicates the acceptance of these policies, terms and conditions, and ratifies their knowledge and consent with the policies stated herein.

- The data of professors, teachers, teachers' directors, officials and employees of the Corporation are collected at the time of the selection process and are necessary to create the file of each employee.

- The data of the members of the School Government bodies. This data is collected for the purpose of identifying them and maintaining open communication with them. Because of their role in the school's governance structure, the members of these bodies must be contacted on an ongoing basis.

By accepting the position, the members of the School Governance bodies accept these policies and the handling of their personal information for the purpose of contacting them.

- The data of users and customers of the goods and services offered by the Corporation. This includes users of sports, cultural and religious facilities.

- The data of people who work or collaborate with the school's media (website, newspapers, magazines, yearbooks, etc.).

- The data of those affiliated to other legal entities that have a direct relationship with the Corporation, such as the Alumni Association, the Parents' Association, the Employees' Fund, etc.

- Data on speakers and attendees at lectures, conferences, seminars, and discussions. All these data are collected with the purpose of identifying them and maintaining open communication with them.

2.2. Information storage

- Regarding students, once the enrollment process is completed, a special folder is created electronically to file all personal, academic, disciplinary and medical information of each student.

Access to this folder is limited to those persons who are directly involved in the educational and pedagogical process of the student (group director, area teachers, and school directors).

- With regard to the data of professors, teachers, school directors, officials and employees of the Corporation, once the process is completed, electronically, a special folder is created to file all the personal, work and medical information of each employee.

- The data of the members of the School Government bodies are stored electronically in the files of the Corporation's General Management.

- Data on clients and users of the Corporation's facilities are kept in the files of the Corporation's administrative and financial management.

POLICIES AND PROCEDURES APPLICABLE TO THE PROCESSING OF PERSONAL DATA

2.3. Use of Information:

- The different areas of the Corporation and the School may have access to the databases in relation to their specialty and task within the institution.
- Managers and teachers will have information about students and their families in order to manage the pedagogical relationship, apply the PEI and the School Handbook, carry out service campaigns and attend to everything related to educational obligations.

2.4. Circulation of Information:

- The Corporation and/or the School will use the information related to its students and their families, only for the purposes established by law and within the Colombian territory.
- Under no circumstances will the personal data contained in the Corporation's databases be transferred to third parties, temporarily or permanently, partially or totally, free of charge or for a fee.
- The Corporation and the School guarantee that the handling of the information is and will be carried out under the highest levels of security and confidentiality. In the event that judicial authorities request this information from the Corporation, the Corporation will be obliged to share it in accordance with Colombian law.

2.5. Revocation of the Authorization and/or suppression of the data:

- Given the revocable nature of the authorization, the holders of the information may, at any time, revoke the authorization granted for the processing of their personal data. This request should be addressed as follows:

To the e-mail: tecnologia@alcaparros.edu.co, provided that the e-mail address from which the request is sent is registered in the database. Otherwise you can use the telephone line No. (57 1) 592 2266, in which you will be asked for the respective control data.

Note: Under no circumstances will information related to performance evaluations, academic work, results reports, report cards and other data used by the Corporation and/or the School to record student performance be eliminated or deleted.

- As long as this revocation does not occur, it will be understood that the authorization given by the holder of the information remains in force.

3. PURPOSES FOR WHICH THE CORPORATION COLLECTS PERSONAL DATA

3.1. The information of students and their families that have been collected in our database has the following purposes:

- To carry out the pedagogical process and other objectives contained in the Institutional Educational Project.
- Comply with the School Handbook.
- Inform students in a timely manner about the activities of the School, as well as about the benefits they can access, through the different activities and programs deployed by the different areas of the School.
- To carry out follow-up campaigns and verification of service quality, satisfaction surveys, updating of information data, pedagogical campaigns and special services.
- Attend to Questions, Complaints and Grievances - PQRs -.

POLICIES AND PROCEDURES APPLICABLE TO THE PROCESSING OF PERSONAL DATA

- Provide information to administrative, judicial and public entities authorized by law.
- Collect financial information from the families of students, for those cases in which the school has to make judicial or extrajudicial collections.

3.2. The data collected from employees are intended for the following purposes:

- Comply with legal obligations in the development of the labor contract.
- Properly handle sensitive information, as provided in Article 12 of Law 1581 of 2012. With respect to this information the School undertakes to:
 - a. Inform the owner of the information the treatment to which the personal data will be subjected and the purpose of the same.
 - b. The optional nature of the response to the questions that are made, when they deal with sensitive data or data of children and adolescents.
 - c. The rights that you have as owner.
 - d. The identification, physical and/or electronic address and telephone number of the data controller, who undertakes to keep proof of its compliance and to provide a copy to the data owner when needed.

3.3. The data collected from suppliers, advisors and consultants have the following purposes:

- The comparison of offers and market research.
- Collect information on invoicing, dispatch and receipt of goods.
- The evaluation of professional experience, payments, financial analysis, review of fair trade policies and judicial collections.

4. MODIFICATION AND/OR UPDATE OF THE DATA PROTECTION AND INFORMATION MANAGEMENT POLICY.

Any change or substantial modification to the internal policies for the processing of personal data, as provided in Article 5 of Decree 1377 of 2013, shall be communicated in a timely manner to the holders of personal data in an effective way that ensures their knowledge and understanding, which shall be done before implementing the new policy.

5. VALIDITY OF THE POLICIES FOR THE PROCESSING OF PERSONAL DATA

These policies are effective as of April 20, 2015. Contact information of the person responsible for the processing of personal data:

Name: Héctor Mauricio Ortiz Peña

Position: Director of Technology

Telephone: (57 1) 592 2266

E-mail: tecnologia@alcaparros.edu.co

Address: Vía Bogotá - La Calera, Vereda El Salitre, Kilómetro 3, La Calera, Cundinamarca.

In case you have any questions or concerns regarding the handling of your personal data, you can write to the e-mail: tecnologia@alcaparros.edu.co.