



POLICIES AND PROCEDURES APPLICABLE TO THE PROCESSING OF PERSONAL DATA

The **CORPORACIÓN EDUCATIVA LOS ALCAPARROS**, a non-profit entity established in accordance with the laws of the Republic of Colombia, legally recognized by Resolution No. 316 dated June 8, 1992, issued by the Mayor's Office of Bogotá, identified with NIT 800.167.916-0 (hereinafter, the "Corporation"), is the owner of the private educational institution known as **COLEGIO HACIENDA LOS ALCAPARROS**, which holds an Operating License granted by Resolution No. 2394 of June 28, 2004 and Resolution No. 5421 of September 7, 2016, issued by the Cundinamarca Department of Education (hereinafter, the "School").

In compliance with the provisions of Statutory Law 1581 of 2012 "which establishes general provisions for the protection of personal data," Regulatory Decree 1377 of 2013 "which partially regulates Law 1581 of 2012," and Decree 1074 of 2015 "which issues the Sole Regulatory Decree of the Commerce, Industry, and Tourism Sector," the Corporation has prepared and established the following internal policies aimed at the proper handling and management of the personal data collected and stored in its databases.

This document aims to communicate and disseminate these policies among all members of our community, including all individuals involved in or related to the educational, social, recreational, and cultural activities carried out by the Corporation.

Accordingly, the policies outlined herein shall apply to students, parents, users of sports facilities, speakers, affiliates, staff, employees, administrators, associates, members of the School Government bodies, and any other natural persons who are or become involved in any way with the Corporation or the School and who may participate in the collection or processing of personal data.

1. PROCESSING OF PERSONAL DATA COLLECTED BY THE CORPORATION AS DATA CONTROLLER

For the processing, collection, storage, use, circulation, and deletion, among others, of personal data of natural persons by the Corporation, prior and informed authorization must be obtained from the Data Subject (the natural person whose personal data is subject to Processing), or from someone legally authorized in accordance with Article 20 of Decree 1377 of 2013 and Article 2.2.2.25.4.1 of Decree 1074 of 2015. This authorization may be granted in writing, orally, or through unequivocal conduct by the Data Subject that allows one to reasonably conclude that consent has been granted and that such consent can be consulted later by the Data Subject or someone authorized to exercise their rights under the law.

For the purposes of this policy, the following terms shall have the meanings defined in Statutory Law 1581 of 2012, Decree 1377 of 2013, and Decree 1074 of 2015:



- a) Authorization:** Prior, express, and informed consent of the Data Subject to carry out the Processing of personal data.
- b) Privacy Notice:** Verbal or written communication generated by the Controller and addressed to the Data Subject for the Processing of their personal data, through which they are informed of the existence of applicable data processing policies, the means to access them, and the purposes for which the personal data will be processed.
- c) Database:** An organized set of personal data that is subject to Processing.
- d) Personal Data:** Any information linked or that can be associated with one or more identified or identifiable natural persons. Certain types of Personal Data are considered "public data", such as those included in the Civil Registry. The Corporation, in order to fulfill its legal and contractual obligations, requires the processing of various Personal Data, including that of students, parents, and employees, which are subject to the provisions established by Law 1581 of 2012, Decree 1377 of 2013, and Decree 1074 of 2015, and therefore, to this policy.
- e) Sensitive Data:** Sensitive Data are those that affect the privacy of the Data Subject or whose misuse can lead to discrimination, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, membership in unions or social organizations, human rights organizations, or political parties or opposition groups, as well as data concerning health, sexual life, and biometric data.
- f) Data Processor:** A natural or legal person, public or private, who processes personal data on behalf of the Data Controller.
- g) Data Controller:** A natural or legal person, public or private, who alone or in association with others, decides on the Database and/or the Processing of the data.
- h) Data Subject:** A natural person whose Personal Data is subject to Processing.
- i) Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.
- j) Transfer:** A data transfer occurs when the Data Controller and/or Processor located in Colombia sends personal data to a recipient, who is in turn a Data Controller located inside or outside the country.
- k) Transmission:** The processing of personal data involving its communication within or outside Colombian territory when the purpose is to carry out Processing by the Processor on behalf of the Controller.

2. RIGHTS OF DATA SUBJECTS

In accordance with the terms of the applicable regulations on personal data, the Corporation assumes the role of Data Controller in all cases, or in some of them depending on the circumstances, when it collects, stores, uses, circulates, deletes, transfers, or transmits data belonging to Data Subjects in the course of its activities—either directly or through third parties.

The individuals who own and/or are the holders of the Personal Data that is or has been provided to us are entitled to the following rights:

- a) To know, update, and/or rectify their personal data** by submitting a request to the Data Controller or the Data Processor. This right may be exercised in relation to, among others, partial, inaccurate, incomplete, or misleading data, or data whose Processing is expressly prohibited or not authorized.



Note: Performance evaluations, academic work, reports, report cards, and other data used by the Corporation and/or the School to record student performance may not be modified or altered, except in cases where the Data Subject can prove that such data was misfiled or processed in error.

Likewise, performance evaluations, result reports, and other data used by the Corporation and/or the School to assess the performance of teachers, staff, collaborators, or contractors may not be modified or altered, unless the Data Subject can prove that such information was misfiled or processed in error.

b) To request proof of the Authorization granted to the Data Controller, except in cases where such Authorization is not required under Article 10 of Law 1581 of 2012.

c) To be informed by the Data Controller and/or the Data Processor, upon written request, about the use that has been made of their personal data.

d) To file complaints with the Superintendence of Industry and Commerce for violations of Law 1581 of 2012 and other regulations that amend, supplement, or expand it.

e) To revoke the Authorization and/or request the deletion of personal data from the Corporation's Databases when the constitutional and legal principles, rights, and guarantees are not respected. Revocation and/or deletion will proceed when the Superintendence of Industry and Commerce determines that the Data Controller or Processor has engaged in conduct contrary to the Law or Constitution during the Processing.

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

f) To access, free of charge, the personal data that has been processed and of which they are the exclusive Data Subject.

3. PROCEDURES

3.1. Regarding the Collection of Data and Information

As part of fulfilling its mission, the Corporation regularly collects personal data from individuals who maintain any type of relationship with the institution. The most representative examples of this are:

- **Data from parents and children** applying to enter the School. This data is collected for the purpose of carrying out the admissions process.
- **Data from current students and their parents.** This data is collected to identify them and maintain a pedagogical relationship.

Signing the Enrollment Contract by the parents and/or the student implies acceptance of these policies, terms, and conditions, and confirms their knowledge of and consent to the provisions described herein.

- **Data from teachers, administrators, and staff members.** This data is collected during the hiring process and is required to build each employee's file.
- **Data from members of the School Government bodies.** This data is collected to identify them and maintain open communication. Due to the nature of their role within the School Government structure, these members must be contacted on a regular basis.

By accepting their role, members of the School Government bodies also accept these policies and the processing of their personal information for contact purposes.



- **Data from users and clients of the services and facilities offered by the Corporation**, including sports, cultural, and religious facilities.
- **Data from individuals involved in the School's or Corporation's communication channels** (website, newsletters, magazines, yearbooks, etc.).
- **Data from members of other legal entities directly related to the Corporation**, such as the Alumni Association, Parents' Association, Employee Fund, etc.
- **Data from speakers and attendees** at talks, conferences, seminars, and discussion panels.

All of this data is collected with the goal of identification and maintaining open communication.

3.2. Storage of Information

- Regarding students, once the enrollment process is complete, a special digital folder is created to store all personal, academic, disciplinary, and medical information for each student.

Access to this folder is restricted to individuals directly involved in the student's educational and pedagogical process (homeroom teacher, subject teachers, School administrators).

- Regarding employees, once the hiring process is complete, a special digital folder is created to store all personal, employment, and medical information for each staff member.
- Data of members of the School Government bodies is stored electronically in the files of the Corporation's General Directorate.
- Data of users and clients of the Corporation's facilities is stored by the Corporation's Administrative and Financial Office.
- Data from providers of goods or services to the Corporation is collected to have the necessary information to carry out existing agreements, partnerships, and contracts.

Personal data may be transmitted to third parties to allow data subjects to access their personal information through dedicated software, as well as to manage billing and account collection processes.

Such transmission will be carried out under the security and data protection parameters established by the Corporation. Likewise, Data Processors will be required to implement necessary measures to safeguard the information.

3.3. Use of Information

- Various departments within the Corporation and School may access the databases in accordance with their responsibilities within the institution.
- Administrators and faculty members will have access to student and family information to manage the pedagogical relationship, apply the Institutional Educational Project (PEI) and Code of Conduct, implement service campaigns, and address all academic obligations.

3.4. Circulation of Information

- The Corporation and/or School will use information related to students and their families only for legally authorized purposes and within Colombian territory.
- Under no circumstances will the Corporation sell, assign, or transfer personal data—partially or entirely, temporarily or permanently, free of charge or for a fee—to third parties.



- The Corporation and the School guarantee that the handling of information will be carried out under strict standards of security and confidentiality. If required by judicial authorities, the Corporation will be obliged to disclose such information in accordance with Colombian law.

3.5. Handling of Inquiries, Requests, and Complaints

The Corporation must provide free access to the Data Subject who wishes to review their personal information, and must also guarantee the Data Subject's right to submit requests for correction, updates, or deletion of personal data.

The Corporation may receive the aforementioned inquiries, requests, or complaints from:

- a. The Data Subject;
- b. The Data Subject's heirs, legal representatives, or authorized agents;
- c. Public or administrative entities in the exercise of their legal or social functions;
- d. By judicial order or third parties authorized by the Data Subject or by law;
- e. By stipulation in favor of or for another person.

Inquiries, requests, and/or complaints should be submitted through the following channels:

- **Email:** tecnologia@alcaparros.edu.co, provided that the email address from which the request is sent is registered in the Corporation's database.
- **Phone:** (+57 1) 292 2266, where security questions will be asked to verify the identity of the Data Subject.
- **Postal Mail:** Vía La Calera, Vereda El Salitre, Km. 3, Municipality of La Calera, Department of Cundinamarca.

Inquiries regarding Personal Data will be answered by the Corporation within a maximum of ten (10) business days from the date of receipt. If it is not possible to respond within this timeframe, the Data Subject or their heirs will be informed of the reasons for the delay and the date on which the inquiry will be addressed. This additional period shall not exceed five (5) business days following the initial deadline.

The processing of these inquiries and complaints will be free of charge, except in cases expressly established by law.

3.6. Revocation of Authorization and/or Data Deletion

Given the revocable nature of the Authorization, Data Subjects may, at any time, revoke the Authorization previously granted for the Processing of their Personal Data. This request must be submitted through one of the following channels:

- **Email:** tecnologia@alcaparros.edu.co, provided that the email address used to send the request is registered in the database. Otherwise, the request may be made through the following phone line: (+57 1) 292 2266, where identity verification procedures will be followed.
- **Postal Mail:** Vía La Calera, Vereda El Salitre, Km. 3, Municipality of La Calera, Department of Cundinamarca.

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

Until such revocation takes place, it shall be understood that the Authorization granted by the Data Subject remains valid.



4. PURPOSES FOR WHICH THE CORPORATION COLLECTS PERSONAL DATA

4.1. The information collected from applicants, students, and their parents is used for the following purposes:

- To carry out the admissions process for families of children and adolescents applying to the School.
- To implement the educational process and the objectives established in the School's Institutional Educational Project (PEI).
- To enforce the School's Code of Conduct.
- To inform students and parents in a timely manner about School activities, as well as benefits available through various programs and initiatives carried out by the School's departments.
- To conduct follow-up and quality assurance campaigns, satisfaction surveys, data updates, educational campaigns, and special services.
- To handle inquiries, complaints, and requests (PQRs).
- To provide information to administrative, judicial, and public entities as required by law.
- To collect financial information from families when judicial or extrajudicial collection procedures need to be initiated by the School.
- To consult, report, process, request, send, provide, and disclose information to credit bureaus or any entity that manages databases for the same purposes, in order to assess the risks associated with granting credit or payment terms.
- To publish and disseminate, through the School's and the Corporation's media channels (TV, magazines, School website, student newspaper, social media), photos and/or videos of students and their families participating in educational and extracurricular activities, including concerts, cultural events, excursions, sports, the school fair (Bazar), Cultural Week, and others.

4.2. The data collected from employees is used for the following purposes:

- To comply with legal obligations under the employment contract.
- To properly manage sensitive information, as provided in Article 12 of Law 1581 of 2012. In regard to such data, the School commits to:
 - a. Inform the Data Subject about the processing and purpose of their personal data;
 - b. Clearly indicate that answering questions about sensitive data or information regarding children and adolescents is optional;
 - c. Communicate the rights the Data Subject is entitled to;
 - d. Provide the name, physical and/or electronic address, and phone number of the data controller, who commits to keeping proof of compliance and to providing a copy to the Data Subject when requested.
- To publish and disseminate, through the School's and the Corporation's media channels (TV, magazines, School website, student newspaper, social media), photos and/or videos of employees with students and families participating in educational or extracurricular activities such as concerts, cultural events, excursions, sports, the school fair (Bazar), Cultural Week, and others.

4.3. The data collected from vendors, consultants, and advisors is used for the following purposes:

- To compare offers and conduct market studies.



- To collect billing, shipping, and receiving information.
- To evaluate professional experience, manage payments, conduct financial analysis, review fair trade policies, and handle judicial collection processes.
- To request quotes and product or service information from vendors.

4.4. The data collected from members of the School Government bodies is used for the following purposes:

- To identify members and maintain open communication with them. Due to their role within the School Government structure, these individuals must be contacted on a regular basis.

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

Any substantial change or modification to the internal Personal Data Processing policies, as established in Article 5 of Decree 1377 of 2013, will be communicated in a timely manner to the Data Subjects in an effective way that ensures their awareness and understanding. Such communication will take place before the new policy is implemented.

6. VALIDITY OF THE PERSONAL DATA PROCESSING POLICIES

These policies shall be in effect as of **August 1, 2024**.

Contact information for the Personal Data Controller:

Name: Mauricio Ortiz Peña

Position: Director of the Technology Department

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Email: tecnologia@alcaparros.edu.co

If you have any questions or concerns regarding the handling of your personal data, you may contact us at the email address: tecnologia@alcaparros.edu.co