 <b>The Columbus School</b>	<b>DATA PROCESSING POLICY</b>	<b>Date</b> June 19, 2018 <b>Version 1</b>
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## PERSONAL DATA PROCESSING POLICY

### Introductory

**JUSTIFICATION.** - **CORPORACIÓN COLEGIO CRISTÓBAL COLÓN THE COLUMBUS SCHOOL** (hereinafter THE COLUMBUS SCHOOL) in compliance with the provisions of Law 1581 of 2012, its regulatory decree 1377 of 2013 and the provisions of the Political Constitution of Colombia, adopts this Personal Data Processing Policy (hereinafter POLICY).

**OBJECT.** - The purpose of this POLICY is to define the parameters under which all the personal data collected is treated and stored within the databases of THE COLUMBUS SCHOOL.

This POLICY applies to all databases administered by THE COLUMBUS SCHOOL, within each and every one of its dependencies, in its headquarters located in Km 16 via Las Palmas, Municipality of Envigado. E-mail: [datospersonales@columbus.edu.co](mailto:datospersonales@columbus.edu.co) , Telephone: 4033000, and any third parties that in one way or another manage personal databases of THE COLUMBUS SCHOOL.

**PRINCIPLES.** - The processing of personal data carried out by THE COLUMBUS SCHOOL applies all the principles protected in the General Regime of Protection of Personal Data of Colombia, especially Law 1581 of 2012 and Decree 1377 of 2013.

**CONSULTATION OF THE POLICY.** - THE COLUMBUS SCHOOL makes this POLICY available to the owners of personal data in its facilities, on the website [www.columbus.edu.co](http://www.columbus.edu.co) , and makes its disclosure to the owners by e-mail, newsletter and other appropriate means of dissemination.


**CATEGORY AND CLASSIFICATION OF DATA.** - THE COLUMBUS SCHOOL according to the data treated, it accepts the classification ordered by Law 1581 of 2012 and Decree 1377 of 2013.

### **GUARANTEE OF THE RIGHTS OF PERSONAL DATA OWNERS**

**OWNERS** are natural persons whose personal data is collected and subject to Treatment by THE COLUMBUS SCHOOL.

**RIGHTS OF THE OWNERS.** - THE COLUMBUS SCHOOL expresses the will to protect the rights of the owners of personal data; in this sense and according to the law, it indicates the following rights in the head of said owners:

- Know, update, rectify and delete your personal data from the databases of THE COLUMBUS SCHOOL

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- Request proof of authorization granted to THE COLUMBUS SCHOOL for the processing of your data.
- To be informed by THE COLUMBUS SCHOOL, upon request, regarding the use that has been given to your personal data.
- Present before the Superintendence of Industry and Commerce, complaints for infractions to the processing of your personal data.
- Revoke the authorization or request the removal of the data when the constitutional and legal principles, rights and guarantees are not respected.
- Access and know for free the personal data that are subject to treatment in accordance with the provisions of the law.

These rights may be exercised by:

- The owner of personal data.
- The heirs of the owner of the personal data.
- The legal representative of the owner of personal data.

For the strict fulfillment of these rights, is established as purposes of the POLICY:

- Ensure the privacy and security of the data of each and every member of the THE COLUMBUS SCHOOL Community.
- Make available to all owners, the Personal Data Processing policy adopted.
- Indicate to the OWNERS, the purpose or the reasons why THE COLUMBUS SCHOOL requires to carry out the processing of personal data.
- Inform about the terms, conditions and purposes under which THE COLUMBUS SCHOOL performs the collection, storage, use, circulation and treatment of the data of the OWNERS.
- Make known the security and confidentiality conditions of the information, as well as the rights applicable to the owners of the information.
- Indicate the procedures so that the DATA OWNERS or their representatives can exercise the rights established for the protection of personal data.

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**CONFIDENTIALITY AND SECURITY OF DATABASES.** - THE COLUMBUS SCHOOL offers all the human and technological resources necessary to provide security and confidentiality to the personal data it has in its possession. In any case, THE SCHOOL will verify, the origin of the legal exceptions to deliver the personal data to the authorities in the pertinent cases.

THE COLUMBUS SCHOOL with the aim of providing and giving its best effort to guarantee the protection of the privacy and confidentiality of the data. The school has competent officials, duly trained and empowered to process the data, and the appropriate technology that supports these processes.

However, taking into account that despite the existence of technological and physical protection measures and that THE COLUMBUS SCHOOL does its best to protect the security and confidentiality of the data, the measures are not infallible and there is the possibility that, due to causes that are strange and outside the School, some subject can access the data collected. For this reason, and in the event that the aforementioned situation is detected by THE COLUMBUS SCHOOL and a breach of confidentiality or attack is generated, it will be reported immediately to the competent authority.


**AUTHORIZATION FOR THE USE OF PERSONAL DATA.** - THE COLUMBUS SCHOOL for the processing of personal data, will request the OWNERS of the data their clear, prior, express and informed authorization, by any suitable means that allows the storage of the same for legal purposes.

**COLLECTION, STORAGE, USE, CIRCULATION, SUPPRESSION AND TREATMENT OF DATA:**

THE COLUMBUS SCHOOL has collected the data it manage, including identification, contact, academic, and health information, as well as the activities it develops with said data, in particular in its reception, conservation, provision and administration for the proper purposes of the educational and administrative management indicated in this Data Treatment Policy.

In developing its activity, THE COLUMBUS SCHOOL collects and manages, mainly, personal data about its students and potential students, as well as about their family group or guardians. These data are essential for the adequate provision of education services, and therefore those who want to access these services must provide it. Therefore, administer data of children and teenager, whose treatment is subject to the principles, parameters and requirements contained in Article 7 of Law 1581 of 2012, Article 12 of Decree 1377 of 2013 and Judgment C-778 of 2012 of the Constitutional Court.

Likewise, it manages data of the graduates, in order to strengthen the bonds between them and THE COLUMBUS SCHOOL, and fulfills the duties of conservation of the academic data that govern the activity.

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It also receives data from natural persons who have the quality of employees, candidates to be linked as employees, suppliers or contractors of THE COLUMBUS SCHOOL whose data is used in accordance with the contractual relationship established with them.

Due to the permanence of the students in THE COLUMBUS SCHOOL during the school day, it has a nursing service within which the health status data are known, which are considered sensitive data and will be treated with confidentiality and appropriate measures of security.

The data on the health status provided by students, parents or guardians about them, are essential for the proper provision of medical services that are required while they are in THE COLUMBUS SCHOOL, and develop health promotion activities.

The owner of the data expressly accepts that THE COLUMBUS SCHOOL store, process and use this personal data, partially or totally, for the purposes expressed in the law and in this policy.


**MEANS TO GRANT AUTHORIZATION.** - THE COLUMBUS SCHOOL to obtain authorization to process personal data, will use different means for the owner of the data to use his free consent. The available means are: physical and digital documents, e-mail, and authorization forms.

**REVOCAION OF THE AUTHORIZATION.** - The OWNERS of the personal data can revoke at any time the authorization granted to THE COLUMBUS SCHOOL for the treatment of their personal data or request the total or partial suppression of the same, as long as it is not prevented by a legal or contractual provision.

When the revocation is total in relation to the authorized purposes, THE COLUMBUS SCHOOL ceases the processing of the data; when it is partially, in relation to certain types of treatment, ceases on the occasional revocation, Case in which personal data is still processed for the purposes for which the owner has not revoked his consent.

**NOTICE OF PRIVACY.** - **CORPORACIÓN COLEGIO CRISTÓBAL COLÓN THE COLUMBUS SCHOOL** entity identified with Nit 890.902.829-9 domiciled at Km 16 via Las Palmas, Municipality of Envigado, Telephone: 4033000, respects the privacy of the members of the educational community and in general of all natural person owners of the personal data that they provide. THE COLUMBUS SCHOOL receives data, stores it, and uses it in an adequate and safe way according to its personal data processing policy and the current regulations. Personal data collected by THE COLUMBUS SCHOOL will be used to: Maintain direct contact with families; send information via e-mail of the projects and activities that are being developed in the institution; send to each family notifications and photos of the activities via e-mail, WhatsApp, SMS; make enrollment reports; enroll students in SIMAT; know and monitor the development of the students; know the family environment of the students.

THE COLUMBUS SCHOOL states that within the treatment of personal data that are not public in nature, guarantees and maintains absolute reserve of these, during or after the activities of their

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treatment, only using the use authorized by the Law and to the purposes of treatment consigned in this POLICY and to the authorizations granted for the treatment of personal data by the owner.

**TREATMENT TO WHICH THE DATA AND PURPOSE OF THE DATA WILL BE SUBMITTED.** - The treatment of personal data of parents, students, alumni, teachers, employees, former employees, suppliers, contractors, or anyone with whom THE COLUMBUS SCHOOL has a relationship, permanent or occasional, will be done in the legal framework that regulates the subject and by virtue of its status as an Educational Institution.

In any case, personal data may be collected and processed to:

1. Carry out the sending of information related to programs, activities, news, contents by area of interest, products and other goods or services offered by THE COLUMBUS SCHOOL.
2. Send notifications and photos of the activities of students, teachers and parents via WhatsApp, e-mail, digital platforms.
3. Reports of enrollment.
4. Establish school accident insurance policies for students before insurance companies.
5. Know and monitor the academic, social, attitudinal and personal development of students.
6. Know the social, cultural and family environment of the students.
7. To develop the educational mission of THE COLUMBUS SCHOOL according to its statutes and strategy, to its Institutional Educational Project, and to the AdvancED accreditation criteria.
8. Comply with the regulations in force in Colombia for educational institutions, including any requirements of the municipal education secretary or the Ministry of National Education and other entities and authorities related to education.
9. Comply with the rules applicable to suppliers, including tax and commercial ones.
10. Comply with the provisions of the Colombian legal system in labor and social security matters, applicable to former employees, current employees and candidates for future employment.
11. Conduct surveys related to the services provided by THE COLUMBUS SCHOOL.
12. Develop academic programs, exchanges, summer camps, extracurricular activities and other programs in accordance with its bylaws and strategy
13. Keep in contact with parents, guardians, about the information that is shared with state and private institutions related to students.
14. Encourage development and research in all fields of education, academics, culture, sports and science.

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15. Carry out marketing of its institutional programs, including educational, sports and artistic, programs, activities, news, products and other goods or services offered by THE COLUMBUS SCHOOL.

16. Perform billing, collections, consultations, verification, control, fraud prevention, as well as any other activity related to the educational service and alternative services offered by the institution.

17. Make queries and reports of data to information centers.

18. Seek to maintain contact with graduates and alumni.

19. Share personal data, for the proper development of the institution's own activities, with service providers, educational entities, government entities, and individuals for extracurricular activities, both national and foreign in strict compliance with the authorization for transmission and national and international transfer of personal data.

20. Fulfill all contractual commitments on behalf of THE COLUMBUS SCHOOL with the natural persons of whom it deals with.

**PROOF OF AUTHORIZATION.** - THE COLUMBUS SCHOOL stores in physical or electronic files the authorization granted by the owners of personal data for processing, directly or through third parties contracted for that purpose.

**UPDATING OF THE DATABASES.** -THE COLUMBUS SCHOOL permanently updates its databases in accordance with the provisions of the law on the processing of personal data.

**TRANSFERS OF DATA FOR TREATMENT BY NATIONAL AND INTERNATIONAL THIRD PARTIES.** - THE COLUMBUS SCHOOL may partially or totally transfer personal data to third parties in the country or abroad, in the development of its institutional mission, for which it requests authorization from its owner and implements the necessary actions to comply with the precepts of Colombia, through contracts or agreements that so establish.

## PROCEDURES

**PROCEDURE FOR THE EXERCISE OF THE RIGHT OF THE OWNERS OF PERSONAL DATA.** - THE COLUMBUS SCHOOL in the processing of personal data, defines the following procedures, which can only be exercised by the owner of the data, his heirs or representatives.

To exercise their rights, they will provide at least the following information:

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Full name: \_\_\_\_\_

Identification: \_\_\_\_\_

Procedure: Query \_\_\_ Correction \_\_\_ Update \_\_\_ Deletion \_\_\_ Revocation \_\_\_

Description of the facts that give rise to the request:

\_\_\_\_\_  
\_\_\_\_\_

Documents attached to the application (optional):

\_\_\_\_\_  
\_\_\_\_\_

Contact information: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

Signature: \_\_\_\_\_

**PROCEDURE FOR CONSULTATION ON THE PROCESSING OF PERSONAL DATA.** - THE COLUMBUS SCHOOL makes available to the owners of the data the e- mail [datospersonales@columbus.edu.co](mailto:datospersonales@columbus.edu.co) to raise their queries; likewise, it receives requests at its headquarters at Km 16 via Las Palmas, municipality of Envigado, telephone: 4033000. In the application the owner will indicate the data in: **procedure for the exercise of the right of the owners of personal data.**

**PROCEDURE FOR CORRECTION, UPDATING, RECTIFICATION OR REMOVE OF PERSONAL DATA.** - THE COLUMBUS SCHOOL in compliance with the provisions of the General Protection of Personal Data of Colombia, proceed to correct, update, rectify or delete personal data at the request of the owner or his representative, filling in the data indicated in: **the procedure for exercising the right of the holders of personal data.**

The maximum term to attend the request is fifteen (15) business days from the date of receipt. When it is not possible to attend the request within said term, the interested party will be informed of the reasons for the delay and the date on which his request will be processed, which may not exceed eight (8) business days following the expiration of the first term.

**Paragraph.** For the implementation and monitoring of the provisions of the POLICY related to the personal data protection function THE COLUMBUS SCHOOL designates the Administrative area, which will process the requests of the Owners, related to their rights of access, consultation, rectification, updating, suppression and revocation referred to in law 1581 of 2012.

**EFFECTIVENESS OF POLICY.** - The present POLICY governs from the date of its publication until the conditions of it are in force and leaves without effect any policy prior to it. Its modification will be notified through the appropriate means that allow the owners to learn about it.

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