



THE COLUMBUS SCHOOL PERSONAL DATA PROCESSING POLICY

PRELIMINARY

JUSTIFICATION. – **CORPORACIÓN COLEGIO CRISTOBAL 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, adopts this Personal Data Processing Policy (hereinafter POLICY).

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

This POLICY applies to all databases managed by THE COLUMBUS SCHOOL as RESPONSIBLE and IN CHARGE of data processing, within each and every one of its dependencies, at its headquarters at Km 16 via Las Palmas, Municipality of Envigado. E-mail: datospersonales@columbus.edu.co, Telephone: 4033000, and any third parties that in one way or another manage personal databases of THE COLUMBUS SCHOOL.

BEGINNING. - In the processing of personal data carried out by THE COLUMBUS SCHOOL, all the principles established in the General Regime for the Protection of Personal Data of Colombia are applied, especially Law 1581 of 2012 and Decree 1377 of 2013.

CONSULTATION OF THE POLICY. - THE COLUMBUS SCHOOL makes this POLICY available to the holders of the personal data in its offices, on the website www.columbus.edu.co, and discloses it to the holders by means of email, newsletters and other appropriate means of disclosure.

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

GUARANTEE OF THE RIGHTS OF THE PERSONAL DATA HOLDERS

The **HOLDERS** the natural persons whose personal data is collected and processed by THE COLUMBUS SCHOOL.

RIGHTS OF THE HOLDERS. - THE COLUMBUS SCHOOL expresses its desire to protect the rights of the owners of personal data; in this sense and in accordance with the law, it indicates the following rights in the head of said holders:



- Know, update, rectify and delete their personal data from THE COLUMBUS SCHOOL databases.
- Request proof of the authorization granted to THE COLUMBUS SCHOOL for the treatment of their data.
- Be informed by THE COLUMBUS SCHOOL, upon request, regarding the use that has been given to their personal data.
- Submit to the Superintendence of Industry and Commerce, complaints for violations of the processing of their personal data.
- Revoke the authorization or request the deletion of the data when the constitutional and legal principles, rights and guarantees are not respected.
- Access and know free of charge the personal data that is subject to treatment in accordance with the provisions of the law.

- These rights may be exercised by:
 - The owner of the personal data.
 - The heirs of the owner of the personal data.
 - The representative or proxy of the owner of the personal data.

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

- To ensure the privacy and security of the data of each and every one of the members that make up THE COLUMBUS SCHOOL Community.
- Make available to all THE HOLDERS, the adopted Personal Data Processing policy.
- Indicate to the HOLDERS, the purpose or reasons why THE COLUMBUS SCHOOL needs to carry out the processing of personal data.
- Inform about the terms, conditions and purposes under which THE COLUMBUS SCHOOL carries out the collection, storage, use, circulation, deletion, transmission and transfer and treats the data of the HOLDERS.
- Disclose the security and confidentiality conditions of the information, as well as the rights applicable to the HOLDERS of the information.
- Point out the procedures, so that the HOLDERS of the data or their representatives can exercise the rights established for the protection of personal data.

CONFIDENTIALITY AND SECURITY OF DATABASES. - THE COLUMBUS SCHOOL makes available all the necessary human and technological resources to provide security and confidentiality to the personal data in its possession. In any case, it will verify, when appropriate, 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 contributing its best effort to guarantee the reasonable protection of privacy and confidentiality of data, has competent officials, duly trained and



empowered to process 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 makes its best effort to protect the security and confidentiality of the data, the measures are not infallible and there is the possibility that, for strange causes and unrelated to the School, some subject may access the data collected. For this reason, in the event that the aforementioned situation is detected by THE COLUMBUS SCHOOL and a violation of confidentiality or an attack against it is generated, it will be reported immediately to the competent authority.

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

COLLECTION, STORAGE, USE, CIRCULATION, DELETION, TRANSMISSION AND TRANSFER AND DATA PROCESSING:

THE COLUMBUS SCHOOL has collected the data it manages, including identification, contact, academic, and health data, as well as the activities it develops with said data, particularly in its reception, conservation, disposal and administration for the purposes of educational and administrative management indicated in this Data Processing Policy.

In carrying out its activity, THE COLUMBUS SCHOOL mainly collects and manages personal data about its students and potential students, as well as about their family or guardians. These data are essential for the proper provision of education services, and therefore those who want to access these services must provide it. Therefore, it manages data of children and adolescents, 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 Sentence C-778 of 2012 of the Constitutional Court.

THE COLUMBUS SCHOOL fulfills the duties of conservation of the academic data that govern the activity.

Likewise, it receives data from natural persons who have the quality of employees, candidates to be linked as employees, suppliers or contractors of THE COLUMBUS SCHOOL, which are 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 data on the state of health is known, which is considered sensitive data and will be treated with confidentiality and appropriate security measures.

The data on the state of health provided by students and parents or guardians about them, are essential



for the adequate provision of medical services that are required while they are at THE COLUMBUS SCHOOL, as well as to prevent the affectation of the educational community and develop health promotion activities that guide the authorities that regulate the matter.

The owner of the data expressly accepts that THE COLUMBUS SCHOOL stores, processes, uses, transmits within its dependencies and transfers with third parties as long as there is an agreement to share and protect the databases, the personal data provided partially or totally, for the purposes expressed in the law and in this policy.

MEANS TO GRANT THE AUTHORIZATION. - THE COLUMBUS SCHOOL, in order to obtain authorization for the processing of personal data, will use different means that allow the owner to express them freely, clearly, expressly and informedly. The means provided are: physical and digital documents, email, forms and authorization forms.

REVOCAION OF THE AUTHORIZATION. - The HOLDERS of the personal data may at any time revoke the authorization granted to THE COLUMBUS SCHOOL for the processing of their personal data or request the total or partial deletion 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 will cease processing the data; when it is partially, in relation to certain types of treatment, it will cease on timely revocation, in which case the personal data continues to be processed for the purposes for which the owner had not revoked their 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 any person natural holders of the personal data they provide. **THE COLUMBUS SCHOOL** receives data, stores it, and uses it properly and safely in accordance with its personal data processing policy and current regulations. The personal data collected by **THE COLUMBUS SCHOOL** will be used to: Maintain direct contact with families; send information via email about the projects and activities that are being developed in the institution; send each family notifications and photos of the activities via e-mail, WhatsApp, SMS; make registration reports; enroll students in SIMAT; know and monitor the development of students; know the family environment of the students.

THE COLUMBUS SCHOOL expresses that within the treatment of personal data that are not of a public nature, it guarantees and maintains absolute confidentiality of these, during or after the activities of its treatment, adhering only to the use authorized by Law and the purposes of treatment enshrined in this POLICY and the authorizations granted for the treatment of personal data by the owner.

TREATMENT TO WHICH THE DATA WILL BE SUBJECTED AND PURPOSE OF THE SAME. - The processing of personal data of parents, students, graduates, alumni, teachers, employees, former employees, pensioners, suppliers, contractors, or any person with whom **THE COLUMBUS SCHOOL** has established a relationship, permanent or occasional, will be carried out within the legal framework that regulates the matter and by virtue of its condition as an Educational Institution.

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

1. Send information related to programs, activities, news, content 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, email, digital platforms.
3. Registration reports.
4. Constitute school accident insurance policies for students with 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. Advanced and COGNIA accreditation criteria.
8. Comply with current regulations in Colombia for educational institutions, including any requirement of the 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, fiscal, commercial. 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.
10. Carry out surveys related to the services provided by THE COLUMBUS SCHOOL.
11. Develop academic programs, exchanges, summer camps, extracurricular activities and other programs in accordance with its statutes and strategy.
12. Keep in contact with parents, guardians, about the information that is shared with state and private institutions related to students.
13. Promote development and research in all training, academic, cultural, sports and scientific fields.
14. Marketing its institutional programs, including educational, sports and artistic programs, activities, news, content by area of interest, products and other goods or services offered by THE COLUMBUS SCHOOL.
15. Carry out billing, collection, collection, consultation, verification, control, fraud prevention activities, as well as any other activity related to the educational service and alternative services offered by the institution.
16. Perform queries and data reports to information centers.
17. Try to keep in touch with graduates and alumni.
18. Share personal data, for the proper development of the activities of the institution, with service providers, educational entities, government entities, entities and natural persons for the



performance of extracurricular activities, both national and foreign in strict compliance with the authorization for national and international transmission.

19. Comply with all contractual commitments by THE COLUMBUS SCHOOL with the natural persons whose data is processed.

PROOF OF AUTHORIZATION. - THE COLUMBUS SCHOOL stores in physical files or electronic repositories the authorization granted by the holders of the personal data for its treatment, directly or through third parties hired for this purpose.

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

DATA TRANSFERS FOR PROCESSING BY NATIONAL AND INTERNATIONAL THIRD PARTIES. THE COLUMBUS SCHOOL may partially or totally transmit or 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 legal precepts of Colombia, through contracts or agreements that establish it.

PROCEDURES

PROCEDURE FOR THE EXERCISE OF THE RIGHT OF HOLDERS 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, their heirs or representatives.

For the exercise of their rights, will provide at least the following information:

Name of the holder: _____ Identification: _____

Procedure: Consultation ___ Correction ___ Update ___ Deletion ___ Revocation ___

Description of the facts that give rise to the request:

Attached documents upon request (optional):



Contact

information:

Address: _____

Telephone: _____

E-mail: _____

Signature _____

PROCEDURE FOR INQUIRIES REGARDING THE PROCESSING OF PERSONAL DATA.- THE COLUMBUS SCHOOL makes available to data owners the email 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 request, the owner will indicate the data indicated in **the procedure for the exercise of the right of the owners of personal data.**

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

The maximum term to respond to the request is fifteen (15) business days from the date of receipt. When it is not possible to meet the request within said term, the interested party will be informed of the reasons for the delay and the date on which their request will be met, 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, who will process the requests of the Holders, related to their rights of access, consultation, rectification, update , suppression and revocation referred to in law 1581 of 2012.

VALIDITY OF THE POLICY. - This POLICY is in force from the date of its publication until its conditions are in force and nullifies any policy prior to it. Its modification will be notified through the suitable means that allow the holders to find out about it.

RUTH ALLEN Ed.D
Superintendent



THE COLUMBUS SCHOOL