


 <b>The Columbus School</b>	<b>PERSONAL DATA PROCESSING POLICY</b>	<b>Code</b> PL-RC-01	<b>Date of Issue</b> 12/12/2023
		<b>Version: 1.0</b>	


## PERSONAL DATA PROCESSING POLICY

Date: 2023-10-10


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## 1. LEGAL BASE AND APPLICATION SCOPE

The information processing policy is developed in compliance with articles 15 and 20 of the Political Constitution, as well as, based on articles 17 literal k) and 18 literal f) of Statutory Law 1581 of 2012, by which General provisions are issued for the Protection of Personal Data (LEPD). Additionally, in compliance with article 2.2.2.25.1.1 section 1 chapter 25 of Decree 1074 of 2015, by which Law 1581 of 2012 is partially regulated.


This policy will be applicable to all personal data registered in databases that are processed by the Data Controller.

### 1.1. Scope

This document will apply to all personal data or any other type of information that is used or rests in the databases and files of CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL), respecting the criteria for obtaining, collecting, using, treatment, processing, exchange, transfer and transmission of personal data, and establish the obligations and guidelines of CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) for the administration and processing of personal data that reside in its databases and files. This Manual is applicable to the processes of CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) that must carry out the Processing of data (public data, semi-private data, private data, sensitive data, data of children and adolescents), as Responsible and Manager.

### 1.2. Applicable Regulations

- Political Constitution of Colombia
- Law 1581 of 2012
- Decree 1074 of 2015 Chapter 25 and Chapter 26, compilations of the decrees:
  - Decree 1377 of 2013
  - Decree 886 of 2014
- Law 1266 of 2008 "By which the general provisions of Habeas Data are dictated."
- Administrative acts issued by the Superintendence of Industry and Commerce.

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## 2. DEFINITIONS

The following definitions are established in article 3 of the LEPD and article 2.2.2.25.1.3 section 1 Chapter 25 of decree 1074 of 2015 (Article 3 of decree 1377 of 2013).

### 2.1. Authorization:

Prior, express and informed consent of the Owner to carry out the processing of personal data.

### 2.2. Database:

Organized set of personal data that is subject to processing, belonging to the same context and systematically stored for subsequent use.

### 2.3. Personal Data:

Any information linked or that can be associated with one or more specific or determinable natural persons. These data are classified as public, semi-private, private and sensitive:

#### 2.3.1. Public Data:

It is the data that is not semi-private, private or sensitive. Public data are considered, among others, data relating to the marital status of people, their profession or trade and their status as a merchant or public servant.


Due to its nature, public data may be contained, among others, in public registries, public documents, official gazettes and bulletins, duly executed judicial rulings that are not subject to confidentiality.

#### 2.3.2. Semi-private Data

It is one that is neither intimate, reserved, nor public in nature and whose knowledge or disclosure may be of interest not only to its Owner but also to a certain sector or group of people or society in general, such as: Databases containing financial and credit information, commercial, services and that from third countries.

#### 2.3.3. Private Data:

It is personal data that, due to its intimate or reserved nature, is only of interest to its holder and its processing requires his prior, informed and express authorization. Databases containing data such as personal telephone numbers and emails; employment data, on administrative or criminal infractions,

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administered by tax administrations, financial organizations and managing entities and common Social Security services, databases on asset or credit solvency, databases with sufficient information to evaluate the personality of the owner, databases of those responsible for operators that provide electronic communication services.

**2.3.4. Sensitive Data:**

Sensitive data is understood to be data that affects the privacy of the Holder or whose improper use may lead to discrimination, such as data that reveals racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, of human rights or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.

**2.4. Treatment Manager:**

Natural or legal person, public or private, who, by themselves or in association with others, processes personal data on behalf of the Data Controller.

**2.5. Responsible for the treatment:**

Natural or legal person, public or private, who alone or in association with others, decides on the database a/o the processing of data.

**2.6. Responsible for managing databases:**


Collaborator in charge of controlling and coordinating the proper application of data processing policies once stored in a specific database; as well as to put into practice the guidelines issued by the Data Controller and the Data Protection Officer.

**2.7. Data Protection Officer:**

It is the natural person who assumes the function of coordinating the implementation of the legal framework for the protection of personal data, which will process the requests of the Holders, for the exercise of the rights referred to in Law 1581 of 2012.

**2.8. Holder**

Natural person whose personal data is processed

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**2.9. Treatment:**

Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

**2.10. Notice of Privacy:**

Verbal or written communication generated by the Controller, addressed to the Holder for the processing of their personal data, through which they are informed about the existence of the information processing policies that will be applicable to them, the way to access them and the purposes of the treatment that is intended to be given to personal data.

**2.11. Transfer:**

The transfer of data takes place when the Controller a/o Processor of personal data, located in Colombia, forwards the information or personal data to a recipient, who in turn is Responsible for the treatment and is located inside or outside the country.

**2.12. Transmission:**

Processing of personal data that involves the communication thereof within or outside the territory of the Republic of Colombia when its purpose is to carry out a treatment determined by the person in charge on behalf of the person responsible.


**3. PRINCIPLES OF DATA PROTECTION**

Article 4 of the LEPD establishes principles for the processing of personal data that must be applied, in a harmonious and comprehensive manner, in the development, interpretation and application of the Law. The legal principles of data protection are as follows:

**3.1. Principle of Legality:**

Data processing is a regulated activity that must be subject to the provisions of the LEPD, Decree 1377 of 2013 Compiled in Chapter 25 of Decree 1074 of 2015 and the other provisions that develop it.



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**3.2. Principle of Purpose:**

The treatment must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Holder.

**3.3. Principle of Freedom:**

The treatment can only be carried out with the prior, express and informed consent of the Holder. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that reveals consent. The processing of data requires the prior and informed authorization of the Holder by any means that allows it to be consulted later.

**3.4. Principle of Truthfulness or Quality:**

The information subject to processing must be true, complete, accurate, up-to-date, verifiable and understandable. The processing of partial, incomplete, fragmented or misleading data is prohibited.


**3.5. Principle of transparency:**

In the processing, the right of the Holder to obtain from the Data Controller or the Data Processor, at any time and without restrictions, information about the existence of data that concerns him or her must be guaranteed. At the time of requesting authorization from the holder, the data controller must clearly and expressly inform him/her of the following, keeping proof of compliance with this duty:

- The processing to which his/her data will be subjected and its purpose.
- The optional nature of the Holder's response to the questions asked when they deal with sensitive data or data of children or adolescents.
- The rights he/she has as the Holder.
- The identification, physical address, email and telephone number of the person responsible for the treatment

**3.6. Principle of Access and Restricted Circulation:**

The processing is subject to the limits derived from the nature of the personal data, the provisions of the LEPD and the Constitution. In this sense, the processing may only be carried out by persons authorized by the Holder a/o by the persons provided for in the Law. Personal data, except public information, may not be available on the Internet and other means of dissemination or mass communication., unless access is

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technically controllable to provide knowledge restricted only to the Holders or authorized third parties in accordance with the Law.

### **3.7. Principle of Security:**

The information subject to processing by the Data Controller or Data Processor must be handled with the technical, human and administrative measures that are necessary to provide security to the records, preventing their adulteration, loss, unauthorized or fraudulent consultation, use or access. The Data Controller has the responsibility of implementing the corresponding security measures and making them known to all personnel who have direct or indirect access to the data. Users who access the information systems of the Data Controller must know and comply with the rules and security measures that correspond to their functions. These security standards and measures are included in PL-02 Internal Security Policies, which are mandatory for all users and company personnel. Any modification of the rules and measures regarding the security of personal data by the data controller must be brought to the attention of users.


### **3.8. Principle of Confidentiality:**

All persons involved in the processing of personal data that are not public in nature are obliged to guarantee the confidentiality of the information, even after their relationship with any of the tasks included in the processing has ended, and may only supply or communicate of personal data when this corresponds to the development of the activities authorized in the LEPD and in its terms.

## **4. AUTHORIZATION TO USE PERSONAL DATA**

In accordance with article 9 of the LEPD, the authorization of the Holder is required for the processing of personal data, except in the cases expressly indicated in the rules that regulate the protection of personal data. In advance a/o at the time of collecting personal data, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will request the Holder of the data for authorization to collect and process it, indicating the purpose for which the data is requested, using for these purposes automated technical means, written or oral, that allow preserving proof of the authorization a/o the unequivocal conduct described in article 2.2.2.25.2.2. section 2 of chapter 25 of Decree 1074 of 2015.

Authorization from the Holder will not be necessary when dealing with:

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- Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- Public nature data.
- Cases of medical or sanitation emergency.
- Treatment of information authorized by Law for historic, statistic or scientific purposes.
- Data related to the Birth Certificate of people.

#### **5. REQUEST FOR AUTHORIZATION TO THE HOLDER OF THE PERSONAL DATA**

The authorization for the use and/or processing of the data will be managed by CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL), through mechanisms that guarantee its subsequent consultation and the manifestation of the will of the Owner through the following means:

- By writing.
- Orally.
- Through automated channels
- Through unequivocal conduct of the holder that allows it to be reasonably concluded that he/she granted the authorization.


CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL), in advance a/o at the time of collecting personal data, will clearly and expressly inform the Holder of the following:

- a) The Treatment to which his/her personal data will be subjected and the purpose thereof;
- b) The optional nature of the response to the questions asked, when they relate to sensitive data or the data of children and adolescents;
- c) The rights he/she has as the Holder;
- d) Identification, physical or electronic address and telephone number of CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL).

#### **6. RESPONSIBLE FOR THE TREATMENT**

The one responsible for the processing of the databases that are the subject of this policy is CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL), whose contact information is as follows:

- Address: KM 16 LAS PALMAS, ENVIGADO - ANTIOQUIA
- email: [datospersonales@columbus.edu.co](mailto:datospersonales@columbus.edu.co)

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- Telephone: 4033000

## 7. TREATMENT AND PURPOSES OF DATABASES

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL), in the development of its business activity, carries out the processing of personal data relating to natural persons that are contained and processed in databases intended for legitimate purposes, in compliance with the Constitution and the Law. The processing to which personal data will be subjected includes collection, storage, use, circulation or deletion. The processing of the data will be subject to the purposes authorized by the Holder, the contractual obligations between the parties, as well as cases in which there are legal obligations that must be fulfilled.

Annex 1 PL-01 called Database Organization, contains information related to the different databases under the responsibility of the company and the purposes assigned to each of them for their treatment.


## 8. TERM OF THE DATABASE

The personal data incorporated in the databases will be valid for the period necessary to fulfill the purposes for which their processing was authorized and the special regulations that regulate the matter, the current regulations related to the conservation period will also be taken into account.

## 9. RIGHTS OF THE HOLDERS

In accordance with article 8 of the LEPD, article 2.2.2.25.4.1 section 4 chapter 25 of Decree 1074 of 2015 (Articles 21 and 22 of Decree 1377 of 2013), the Data Holders can exercise a series of rights in relation with the processing of their personal data. The Holder of the personal data will have the following rights:

- a) Know, update and rectify their personal data in front of the Data Controllers or Data Processors. This right may be exercised, among others, against partial, inaccurate, incomplete, fragmented, misleading data, or those whose processing is expressly prohibited or has not been authorized;
- b) Request proof of the authorization granted to the Data Controller except when it is expressly excepted as a requirement for the treatment, in accordance with the provisions of article 10 of this law;
- c) Be informed by the Data Controller or the Data Processor, upon request, regarding the use that has been given to his/her personal data;

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- d) Submit complaints to the Superintendence of Industry and Commerce for violations of the provisions of this law and other regulations that modify, add or complement it;
- e) Revoke the authorization a/o request the deletion of the data when the processing does not respect constitutional and legal principles, rights and guarantees. Revocation a/o deletion will proceed when the Superintendence of Industry and Commerce has determined that the Treatment the Controller or Processor has engaged in conduct contrary to the law and the Constitution;
- f) Access free of charge to his/her personal data that has been processed.

These rights may be exercised by the following persons:

1. By the Owner, who must prove his/her identity sufficiently by the different means made available by the Controller.
2. By their successors, who must prove such quality
3. By the representative a/o attorney-in-fact of the Holder, prior accreditation of the representation or power of attorney.
4. By stipulation in favor of another and for another.

The rights of children or adolescents will be exercised by the people who are empowered to represent them.


### 9.1. Right of Access or Inquiry

This is the right of the Holder to be informed by the data controller, upon request, regarding the origin, use and purpose given to his/her personal data.

### 9.2. Rights to Claims and Grievances

Law distinguishes four types of claims:

- *Correction claim*: The Holder's right to have partial, inaccurate, incomplete, fragmented, misleading data updated, rectified or modified, or data whose processing is expressly prohibited or has not been authorized.
- *Claim for deletion*: the right of the Holder to have data deleted that is inadequate, excessive or that does not respect constitutional and legal principles, rights and guarantees.

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- *Revocation claim*: the right of the Holder to revoke the authorization previously provided for the processing of his/her personal data.
- *Infringement claim*: the right of the Holder to request that non-compliance with Data Protection regulations be remedied.

### **9.3. Right to request proof of the authorization granted to the Data Controller**

Except when it is expressly excepted as a requirement for treatment in accordance with the provisions of article 10 of the LEPD.

### **9.4. Right to file complaints of infringements with the Superintendence of Industry and Commerce**


The Holder or successor in title may only submit the request (complaint) to the SIC – Superintendence of Industry and Commerce, once the consultation or claim procedure has been exhausted before the Data Controller or Data Processor.

## **10. PROCESSING OF CHILDREN DATA**

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) in accordance with Article 7 of Law 1581 of 2012, carries out the processing of personal data of children and adolescents within the framework of the criteria indicated in Article 2.2.2.25.2.9 section 2 of Chapter 25 of Decree 1074 of 2015 (Article 12 of Decree 1377 of 2013), with observance of the following parameters and requirements:

5. That the use of the data responds to and respects the best interests of children and adolescents.
6. That the use of the data ensures respect for the fundamental rights of the minor.

Once the above requirements have been met, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will request the legal representative of the child or adolescent to authorize the child or adolescent to exercise his or her right to be heard, an opinion that will be assessed taking into account the maturity, autonomy and ability to understand the matter. As the Data Controller a/o Processor, it will ensure the appropriate use of the data of children and adolescents, applying the principles and obligations established in Law 1581 of 2012 and regulatory standards. Likewise, it will identify the sensitive data collected or stored in order to increase the security and processing of the information.

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## 10. DUTIES AS DATA CONTROLLER

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) in its capacity as Data Controller shall comply with the following duties, without prejudice to the other provisions provided for in this law and in others that govern its activity:

### 11.1. Regarding the Holder:


- a) Guarantee to the Holder, at all times, the full and effective exercise of the right of habeas data;
- b) Request and keep, under the conditions provided for in this Law, a copy of the respective authorization granted by the Holder;
- c) Duly inform the Data Subject about the purpose of the collection and the rights to which he/she is entitled by virtue of the authorization granted;
- d) To deal with inquiries and complaints made in accordance with the provisions of this Act;
- e) Upon request of the holder, report the use given to his/her data

### 11.2. Regarding the Controller:

- a) Ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable;
- b) Update the information, communicating in a timely manner to the Data Processor, all the news regarding the data previously provided to the Data Processor and adopt the other necessary measures to ensure that the information provided to the latter is kept up to date;
- c) Rectify the information when it is incorrect and communicate the pertinent information to the Data Processor;
- d) Inform the Data Processor when certain information is under discussion by the Data Controller, once the claim has been submitted and the respective procedure has not been completed;
- e) Provide the Data Processor, as the case may be, only data whose Processing is previously authorized in accordance with the provisions of this law;
- f) Require the Data Processor to respect the security and privacy conditions of the Holder's information at all times.

### 11.3. Regarding Principles and other Obligations:

- a) Observe the principles of legality, purpose, freedom, quality, truthfulness, transparency, restricted access, circulation, security and confidentiality;

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- b) Adopt an internal manual of policies and procedures to ensure proper compliance with this Act and, in particular, for dealing with queries and complaints;
- c) Report to the data protection authority when there are violations of security codes and there are risks in the management of the Holders' information.
- d) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.
- e) Preserve the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.

#### **11. DUTIES AS A PROCESOR**

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) in its capacity as Data Processor shall comply with the following duties, without prejudice to the other provisions provided for in this law and in others that govern its activity:

- a) Guarantee to the Holder, at all times, the full and effective exercise of the right of habeas data;
- b) Keep the information under security conditions necessary to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access;
- c) Timely update, rectify or delete the data under the terms of this law;
- d) Update the information reported by the Data Controllers within five (5) business days from receipt;
- e) Process the queries and claims made by the Holders in the terms indicated in this law;
- f) Adopt an internal manual of policies and procedures to guarantee adequate compliance with this law and, especially, to respond to queries and claims by the Holders;
- f) Register in the database the legend "claim in process" in the manner regulated in this law;
- g) Insert in the database the legend "information under judicial discussion", once notified by the competent authority about judicial processes related to the quality of personal data;
- h) Refrain from circulating information that is being controversial by the Holder and whose blocking has been ordered by the Superintendence of Industry and Commerce;
- i) Allow access to information only to those who can have access to it;
- j) Inform the Superintendence of Industry and Commerce when violations of security codes occur and there are risks in the administration of the Holder's information;
- k) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.



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## 12. ATTENTION TO RIGHT HOLDERS

To deal with requests, queries and claims regarding the protection of personal data, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) has appointed a Data Protection Officer. Data Holders may submit their requests or queries through the following channels:

**email:** [datospersonales@columbus.edu.co](mailto:datospersonales@columbus.edu.co)

**Address:** KM 16 LAS PALMAS, ENVIGADO - ANTIOQUIA.

**Telephones:** 4033000

## 13. PROCEDURES TO EXERCISE THE RIGHTS OF THE HOLDER


### 14.1. Right to Access or inquiry

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will guarantee the Holder free consultation of his/her personal data in the following cases (Article 2.2.2.25.4.2. Section 4, chapter 25 of Decree 1074 of 2015):

1. At least once every calendar month;
2. Whenever there are substantial modifications to the information processing policies that motivate new queries.

For queries whose frequency is greater than one for each calendar month, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) may charge the Holder costs for shipping, reproduction and, where applicable, certification of documents. The reproduction costs may not be greater than the recovery costs of the corresponding material. For this purpose, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will demonstrate to the Superintendence of Industry and Commerce, when required, the support for said expenses.

The Holder of the data can exercise the right of access or consultation of his/her data by writing to CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) forwarded by email to: [datapersonales@columbus.edu.co](mailto:datapersonales@columbus.edu.co), indicating in the Subject "Exercise of the right of access or consultation", or through postal mail forwarded to KM 16 LAS PALMAS, ENVIGADO - ANTIOQUIA. The request must contain the following information:

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- Complete name of the Holder.
- Photocopy of the Citizenship Card of the Holder and, where applicable, of the person representing him/her, as well as the document accrediting such representation.
- Petition in which the request for access or consultation is specified.
- Address for notifications, date and signature of the applicant.
- Documents supporting the request made, when applicable.
- Documents supporting the request made, when applicable.

The Holder may choose one of the following ways to consult the database to receive the requested information


- On screen display.
- In writing, with a copy or photocopy forwarded by certified mail or not.
- Email or other electronic means.
- Another system appropriate to the configuration of the database or the nature of the treatment, offered by CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL).

Once the request is received, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will resolve the consultation request within a maximum period of ten (10) business days from the date of receipt thereof. When it is not possible to attend to the query within said term, the interested party will be informed, expressing the reasons for the delay and indicating the date on which his/her query will be attended to, which in no case may exceed five (5) business days following the expiration of the first term. These deadlines are set in article 14 of the LEPD.

Once the consultation process has been exhausted, the Holder or successor in title may file a complaint with the Superintendence of Industry and Commerce.

#### **14.2. Rights to claims and grievances**

The Holder of the data can exercise the rights of claim over his/her data by writing to CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) forwarded by email to: [tatospersonales@columbus.edu.co](mailto:tatospersonales@columbus.edu.co), indicating in the Subject "Exercise of the right of access or consultation", or through postal mail sent to KM 16 LAS PALMAS, ENVIGADO - ANTIOQUIA. The request must contain the following information:

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- Holder's complete name.
- Photocopy of the Citizenship Card of the Holder and, where applicable, of the person representing him/her, as well as the document accrediting such representation.
- Description of the facts and petition in which the request for correction, suppression, revocation or inflation is specified.
- Address for notifications, date and signature of the applicant.
- Documents accrediting the request made that an interested party wishes to assert, when applicable.

If the complaint is incomplete, the interested party will be required within five (5) days of receipt of the complaint to correct the defects. If two (2) months have elapsed from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

Once the complete claim has been received, a legend will be included in the database that says "claim in process" and the reason for it, within a period of no more than two (2) business days. Such legend shall be maintained until the claim is settled


CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will settle the claim request within a maximum period of fifteen (15) business days from the date of receipt of the same. When it is not possible to attend to the claim within this period, the interested party will be informed of the reasons for the delay and the date on which his/her claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

Once the claim process has been exhausted, the Holder or successor in title may file a complaint with the Superintendencia of Industry and Commerce.

**14.3. Authorized to receive information**

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will provide the information of the Holders of its databases to the following persons enabled or authorized to receive it, in accordance with Article 13 of Law 1581 of 2012:

- To the Holders, their successors or their legal representatives;
- To public or administrative organizations in the exercise of their legal functions or by court order;

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- To third parties authorized by the Holder or by the Law

#### **14.3.1. Verification of the authority to request or receive information**

In order to manage the request for consultation or complaint, the applicant must provide the following documents to prove his/her ownership or the authority to receive the required information, in accordance with the following cases:

- Holder: Copy of his/her Identification Document.
- Successor: Identification document, Death Registration Certificate of the Holder, document that proves the capacity in which he/she acts and a copy of the identification document of the Holder.
- Legal representative a/o attorney-in-fact: Valid identification document, document that proves the capacity in which he/she acts (Power of Attorney) and copy of the identification document of the Holder.

#### **14. DATA PROCESSING IN VIDEO SURVEILLANCE SYSTEMS**


CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will inform people about the existence of video surveillance mechanisms, through the posting of visible announcements within the reach of all Holders and installed in the video surveillance areas, mainly in the entrance areas to the places that are being watched and monitored and inside them. These notices will inform who is the Data Controller, the purposes of the processing, the rights of the Holder, the channels enabled to exercise the rights of the Holder, as well as where the Information Processing Policy is published.

On the other hand, it will keep images only for the time strictly necessary to fulfill the purpose and it will register the database that stores images in the National Registry of Databases, unless the Processing consists only of the reproduction or emission of images in real time.

Access to and dissemination of the images will be restricted to persons authorized by the Holder a/o at the request of an authority in the exercise of its functions. Consequently, disclosure of information collected will be controlled and consistent with the purpose established by the Data Controller.

#### **15. SECURITY MEASURES**

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL), in order to comply with the principle of security enshrined in article 4 letter g) of the LEPD, has implemented technical, human and


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administrative measures necessary to guarantee the security of the records by preventing their adulteration, loss, consultation, use or unauthorized or fraudulent access.

On the other hand, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL), through the signing of the corresponding transmission contracts, has required the data processors with whom it works to implement the necessary security measures to guarantee the security and confidentiality of the information in the processing of personal data.


The following are the security measures implemented by CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) that are included and developed in its PL-02 Internal Security Policies (Tables I, II, III and IV).

<b>TABLE I: Security measures common for all type of data (Public, private, confidential, reserved) and databases (automated, non-automated)</b>	
<b>Documents &amp; Supports Management</b>	<ol style="list-style-type: none"> <li>1. Measures to prevent improper access to or recovery of data that has been discarded, deleted, or destroyed.</li> <li>2. Restricted access to the place where data is stored.</li> <li>3. Authorization from the person in charge of administering the databases for the output of documents or media by physical or electronic means.</li> <li>4. Labeling system or identification of the type of information.</li> <li>5. Media inventory.</li> </ol>
<b>Access Control</b>	<ol style="list-style-type: none"> <li>1. Limited user access to the data necessary for the performance of their functions.</li> <li>2. Up-to-date list of users and authorized access.</li> <li>3. Mechanisms to prevent access to data with rights other than those authorized.</li> <li>4. Granting, altering or cancelling permits by authorized personnel</li> </ol>
<b>Incidences</b>	<ol style="list-style-type: none"> <li>1. Record of incidents: type of incident, time of occurrence, issuer of the notification, recipient of the notification, effects and corrective measures.</li> <li>2. Incident notification and management procedure.</li> </ol>

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<b>Personal</b>	<ol style="list-style-type: none"> <li>1. Definition of duties and obligations of the users having right to data access.</li> <li>2. Definition of the control functions and authorizations delegated by the controller.</li> <li>3. Disclosure to staff of the rules and the consequences of non-compliance with them</li> </ol>
<b>Internal Security Manual</b>	<ol style="list-style-type: none"> <li>1. Preparation and implementation of the mandatory manual for staff.</li> <li>2. Minimum content: scope, security measures and procedures, roles and duties of staff, description of databases, incident procedure, identification of data processors.</li> </ol>

<b>TABLE II: Security Measures common to all types of databases (Public, private, confidential, reserved) in accordance to the type of database</b>	
<b>Non-automated Databases</b>	
<b>File</b>	<ol style="list-style-type: none"> <li>1. Filing documentation following procedures that guarantee correct conservation, location and consultation, which allow the exercise of the rights of the Holders.</li> </ol>
<b>Storage of Documents</b>	<ol style="list-style-type: none"> <li>1. Storage devices with mechanisms that prevent access by unauthorized persons.</li> </ol>
<b>Document Custody</b>	<ol style="list-style-type: none"> <li>1. Duty of care and custody of the person in charge of documents during the review or processing of documents.</li> </ol>
<b>Automated Databases</b>	
<b>Identification &amp; authentication</b>	<ol style="list-style-type: none"> <li>1. Personalized identification of users to access information systems and verification of their authorization.</li> <li>2. Identification and authentication mechanisms; Passwords: assignment and expiration.</li> </ol>
<b>Telecommunications</b>	<ol style="list-style-type: none"> <li>1. Access to data by means of secure networks.</li> </ol>

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<b>TABLE III: Security Measures for private data in accordance with the type of databases</b>	
<b>Non-automated Databases</b>	
<b>Audit</b>	<ol style="list-style-type: none"> <li>1. Ordinary Audit (internal or external) every two months.</li> <li>2. Extraordinary audit for substantial modifications in information systems.</li> <li>3. Report on the detection of deficiencies and proposal for corrections.</li> <li>4. Analysis and conclusions of the Security Officer and the Data Controller.</li> </ol>
<b>Security Manager</b>	<ol style="list-style-type: none"> <li>1. Appointment of one or several Administrators of the databases.</li> <li>2. Appointment of one or more persons in charge of the control and coordination of the measures of the Internal Security Manual.</li> <li>3. Prohibition of delegation of the responsibility of the Data Controller to the Administrators of the databases.</li> </ol>
<b>Internal Security Manual</b>	<ol style="list-style-type: none"> <li>1. Regular compliance checks.</li> </ol>
<b>Automated Databases</b>	
<b>Documents &amp; supports management</b>	<ol style="list-style-type: none"> <li>1. Registration of entry and exit of documents and media: date, forwarder and receiver, number, type of information, method of delivery, person responsible for receiving or delivering.</li> </ol>
<b>Access Control</b>	<ol style="list-style-type: none"> <li>1. Access Control to the place or places where information systems are located</li> </ol>
<b>Identification &amp; authentication</b>	<ol style="list-style-type: none"> <li>1. Mechanism to limit the number of repeated unauthorized access attempts.</li> <li>2. Data encryption mechanisms for transmission.</li> </ol>
<b>Incidences</b>	<ol style="list-style-type: none"> <li>1. Logging of data recovery procedures, person running them, restored data, and manually recorded data.</li> <li>2. Authorization of the Data Controller for the execution of recovery procedures.</li> </ol>



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TABLE IV: Security Measures for sensitive data in accordance with the type of databases	
Non-automated Databases	
<b>Access Control</b>	1. Access only to authorized staff. 2. Access identification mechanism. 3. Logging of unauthorized user access. 4. Destruction that prevents access to or recovery of data.
<b>Storage of Documents</b>	1. Filing cabinets, lockers, or others located in access areas protected with keys or other measures. 2. Measures that prevent access to or manipulation of physically stored documents.
Automated Databases	
<b>Access Control</b>	1. Confidential labeling system.
<b>Identification &amp; authentication</b>	1. Data encrypted mechanisms for transmission and storage.
<b>Storage of documents</b>	1. Access logging: user, time, database accessed, type of access, record being accessed 2. Control of the access log by the security officer. Monthly report.
<b>Telecommunications</b>	1. Data access and transmission by means of safe electronic networks. 2. Data transmission via encrypted networks (VPNs).

## 16. COOKIES OR WEB BUGS

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) may collect personal information from its Users while they use the Website, the Application or the Linked Pages (Landing Page). Users may choose to store this personal information on the website, the application or on the linked portal (Landing Page), in order to facilitate transactions and the services to be provided by CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) and/or its linked portals (Landing Page). Therefore, CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) uses different tracking and data collection technologies such as, first party and third-party cookies, this is the analytics tool that helps website and application holders understand how visitors interact with their properties. This tool may use



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a set of cookies to collect information and provide website usage statistics without personally identifying Google visitors.


This information allows us to learn about your browsing patterns and provide you with personalized services. CORPORACIÓN COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) may use these technologies to authenticate you, to remember your preferences for the use of the website, the application and the linked pages (Landing Page), to present offers that may be of interest to you and to facilitate transactions, to analyze the use of the website, application or linked pages and their services, to use it in the aggregate or combine it with the personal information we hold and share it with authorized organizations.

If a user does not want his/her personal information to be collected through Cookies, he/she can change the preferences in his/her own web browser. However, it is important to note that, if a web browser does not accept Cookies, some of the functionalities of the website, the application a/o linked landing pages may not be available or function properly. You can allow, block or delete cookies installed on your device by configuring the options of the browser installed on your device, as follows:

- **Chrome:**  
<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=es>
- **Microsoft Edge:** <https://support.microsoft.com/es-es/microsoft-edge/permitir-temporalmente-las-cookies-y-los-datos-del-sitio-en-microsoft-edge-597f04f2-c0ce-f08c-7c2b-541086362bd2>
- **Firefox:** <https://support.mozilla.org/es/kb/habilitar-y-deshabilitar-cookies-sitios-web-rastrear-preferencias>
- **Safari:**  
<https://support.apple.com/es-es/HT201265>

## 17. PROTOCOL TO NOTIFY, MANAGE AND RESPOND TO SECURITY INCIDENTS

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) has an incident reporting procedure for communication and notification, between employees, personal data protection officer, data processors, data subjects, surveillance and control entity, as well as judicial entities: for the management

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and response to security incidents from the moment they are detected in order to be evaluated and manage identified vulnerabilities, ensuring that systems, networks, and applications are secure enough.

All users and those responsible for administering databases, as well as any person involved in the collection, storage, use, circulation or any processing or consultation of the databases, must be aware of the procedure to act in the event of security incidents to guarantee confidentiality, availability and integrity of information contained in the databases under their responsibility.

Some examples of security incidents are: failure of security systems that allow access to personal data to unauthorized persons, unauthorized attempt to release a document or medium, loss of data or total or partial destruction of media, change of physical location of databases, knowledge by third parties of passwords, modification of data by unauthorized staff, among others.


In the event of a security incident, the response team or committee will take into account the following criteria:

**Strategy for identifying, containing, and mitigating security incidents.**

- Implement measures to contain and reverse the impact that a security incident may have.
- Properly assess the security incident and its impact on the Data Holders.
- Verify legal or contractual requirements with service providers associated with the security incident.
- Determine the level of risk for the Data Holders and notify the occurrence.
- Verify the roles and responsibilities of the personnel responsible for the operation of the affected information.

**Timeline for Security Incident Management**

Apply the procedure to deal with security incidents, in accordance with parameters that allow for adequate management and mitigation of impact. Verify, in accordance with the security incident assessment, the need to notify organizations, such as: The Attorney General's Office, the Procurator's General's Office, GAULA, the National Police, the Financial Superintendence of Colombia, the Police Cyber Center, colCERT; Police CSIRT, Asobancaria CSIRT, Sectorial CSIRT, among others.

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### **Security Incident Report Progress**

Carry out monitoring in the management by establishing deadlines, evaluate its progress and identify possible conflict points that may arise in the management of the security incident.

### **Security Incident Response Assessment**

Once the security incident has been managed and controlled, the response team must review the actions taken to contain it and make the appropriate adjustments to implement an improvement plan.

### **Implemented Actions and Improvement Plans**

Establish the necessary actions to mitigate the impact of the security incident and prevent it from happening again, through corrective and preventive actions, as well as improvement plans to be adopted by the response team.

### **Documentation and report to the Supervisory and Control Body**


Document in an internal record the information related to the security incident, as well as prepare a report with support of the actions carried out that must be filed with the Superintendence of Industry and Commerce, through the RNBD within 15 working days after the incident has been detected.

### **Review**

Evaluation of the causes that generated the security incident and the success of its management to assess the effectiveness of the controls and actions implemented. Document lessons learned to keep in mind for future occasions.

## **18. ADMINISTRATION OF RISKS ASSOCIATED TO DATA PROCESSING**

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) has identified risks related to the processing of personal data and established controls in order to mitigate their causes, through the implementation of PL-02 Internal Security Policies. Therefore, it will establish a risk management system together with the tools, indicators and resources necessary for its administration, when the organizational structure, internal processes and procedures, the amount of database and types of personal data processed by the organization are considered to be exposed to frequent or high-impact events or situations that affect the proper provision of the service or threaten the information of the holders.

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The risk management system will determine the sources such as: technology, human resources, infrastructure and processes that require protection, their vulnerabilities and threats, in order to assess their risk level. Therefore, in order to guarantee the protection of personal data, the type or group of internal and external people, the different levels of access authorization, will be taken into account. Likewise, the possibility of the occurrence of any type of event or action that may cause damage (material or immaterial) will be observed, such as:

- **Criminality:** Understood as actions, caused by human intervention, that violate the law and are penalized by it.
- **Events of physical origin:** Understood as natural and technical events, as well as events indirectly caused by human intervention.
- **Negligence and institutional decisions:** Understood as actions, decisions or omissions by people who have power and influence over the system. At the same time, they are the least predictable threats because they are directly related to human behavior.


CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) in the risk management program will implement protective measures to avoid or minimize damage in the event of a threat.

**19. DELIVERY OF PERSONAL DATA TO RELEVANT AUTHORITIES**

When a public or administrative body in the exercise of its legal functions or by court order requests CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) to access a/o deliver personal data contained in any of its databases, the legality of the request and the relevance of the requested data in relation to the purpose expressed by the authority will be verified. For the delivery, a document will be signed indicating the data of the requesting organization and the characteristics of the personal information requested, specifying the obligation to guarantee the rights of the Holder, both to the official who makes the request, to the person who receives it, as well as to the requesting body.

**20. INTERNATIONAL TRANSFER AND TRANSMISSION OF PERSONAL DATA**

CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will transfer personal data to countries that provide adequate levels of data protection. It is understood that a country offers an adequate level of data protection when it complies with the standards set by the Superintendence of Industry and Commerce on the matter, which in no case may be lower than those required by Law 1581 of 2012 from its recipients. This prohibition shall not apply in the case of:


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- Information in respect of which the Holder has given its express and unequivocal authorization for the transfer.
- Exchange of medical data, when required by the Data Controller's processing for reasons of health or public hygiene.
- Bank or stock market transfers, in accordance with the applicable legislation.
- Transfers agreed within the framework of international treaties to which the Republic of Colombia is a party, based on the principle of reciprocity.
- Transfers necessary for the execution of a contract between the Data Holder and the Data Controller, or for the execution of pre-contractual measures, provided that the Holder has authorized them.
- Transfers legally required for the safeguarding of the public interest, or for the recognition, exercise or defense of a right in a judicial process.

In cases in which the transfer of data is necessary and the country of destination is not on the list of countries considered as safe harbors indicated by the Superintendence of Industry and Commerce, a declaration of conformity regarding the approval for the international transfer of personal data must be obtained before the same organization

International transfers of personal data that are carried out between CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) and a processor to allow the processor to carry out the processing on behalf of the controller, will not require to be informed to the Data Holder or to have his/her consent, provided that there is a contract for the transmission of personal data. This personal data transfer contract must be signed between the Controller and the Processor in order to define the scope of the processing of personal data under their control and responsibility, as well as the activities that the Processor will carry out on behalf of the Controller and the obligations of the Processor towards the Holder. In addition, the Processor must comply with the following obligations and apply the regulations in force in Colombia regarding data protection.

1. To process, on behalf of the Data Controller, personal data in accordance with the principles that protect them
2. Safeguard the security of databases containing personal data.
3. Maintain confidentiality with respect to the processing of personal data

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The above conditions for international data transmissions shall also apply to domestic data transmissions.

## **21. BIOMETRIC DATA TREATMENT**

Biometric data stored in the databases are collected and processed for strictly security reasons, to verify personal identity and to control access to employees, customers and visitors. Biometric identification mechanisms capture, process, and store information related to, among others, people's physical features (fingerprints, voice recognition, and facial aspects), in order to establish or "authenticate" the identity of each individual.

Administration of biometric databases is carried out with technical security measures that guarantee due compliance with the principles and obligations derived from the Statutory Law on Data Protection, also ensuring the confidentiality and reserve of the information of the holders.


## **22. NATIONAL DATABASE REGISTRY – (RNBD)**

The term for registering the databases in the RNBD will be the one established by law. Likewise, in accordance with Article 12 of Decree 886 of 2014, Data Controllers must register their databases in the National Registry of Databases on the date on which the Superintendence of Industry and Commerce enables such registration, in accordance with instructions given for this purpose by that organization. Databases created after this period must be registered within two (2) months from their creation.

## **23. SECURITY OF INFORMATION AND PERSONAL DATA**

Compliance with the regulatory framework on Personal Data Protection, security, reserve a/o confidentiality of information stored in the databases is of vital importance to CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL). For this reason, we have established policies, guidelines and procedures and information security standards, which may change at any time adjusting to new regulations and needs of CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) whose objective is to protect and preserve integrity, confidentiality and availability of information and personal data.

We also guarantee that, in the collection, storage, use a/o processing, destruction or deletion of the information provided, we rely on technological security tools and implement security practices including: transmission and storage of sensitive information through secure mechanisms, use of secure protocols,

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assurance of technological components, restriction of access to information only to authorized personnel, information backup, and secure software development practices, among others.

In the event that it is necessary to provide information to a third party due to the existence of a contractual relationship, we sign a transfer contract to guarantee the reserve and confidentiality of the information, as well as compliance with this Data Processing Policy, the information security policies and manuals and the protocols for customer service established in CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL). In any case, we are committed to the protection, care, security and preservation of the confidentiality, integrity and privacy of the data stored.


#### **24. DOCUMENT MANAGEMENT**

Documents containing personal data must be easily retrieved, that is why the place where each of the documents rests, both physical and digital, must be documented, inspections of these storage routes must be made frequently, their conservation must be guaranteed, defining in what medium and under what conditions this conservation will be carried out, taking into account environmental conditions, storage places, risks to which they are exposed, among others, the retention time of the documents is determined according to the legal requirements if applicable, otherwise each organization defines it according to its needs, it must also be clear about the final disposition of the same, identifying whether it is recycled, reused, preserved, digitized, among others.

Documents that have to do with the protection of personal data must be prepared by personnel or a competent organization for this purpose, and the organization must be the one who reviews and approves all the documents and leaves it registered in the approval box of the documents.

In order to be easily traceable, the documents must be coded, updated and modified by the responsible personnel, this modification will be made whenever necessary; for the deletion of a document you must have the justification for it described in the history which is at the bottom of all documents.

Both physical and digital documents that contain personal data must be protected by external or internal agents that may alter their content, following the guidelines described in PL-02 Internal Security Policy Manual.

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The distribution of documents containing personal data will be carried out by the data controller, who will document the evidence of such distribution, where it is specified, among others; the type of document and the identification of the person to whom the information was given

A person responsible for guaranteeing the confidentiality of the personal data of the holders must be designated. This person will be the one who guards documents, guarantees their physical and digital protection, avoids alterations of the information, and will also guarantee that the documents that leave his custody are identified. and easily traceable.

## 26. TERM

This update of the Policy will be valid from 12-12-2023, the databases under the responsibility of CORPORACION COLEGIO CRISTOBAL COLON - (THE COLUMBUS SCHOOL) will be processed for as long as is reasonable and necessary for the purpose for which the data is collected and in accordance with the authorization granted by the Holders of the personal data.

## 25. APPENDIX

N/A

## 26. PREPARATION AND APPROVAL OF THE DOCUMENT

REVIEW AND APPROVAL OF THE DOCUMENT			
<b>Prepared by:</b>	PROTECDATA COLOMBIA S.A.S	<b>Approved by:</b>	<i>RUTH ALLEN Ed.D</i>
		<b>Post</b>	<i>Superintendent</i>
<b>Date:</b>	<b>2023-12-12</b>	<b>Date:</b>	<b>2023-12-12</b>

## 27. DOCUMENT HISTORY

DATE	VERSION	DESCRIPTION OF THE CHANGE
2023-12-12	01	General legal and technical update of the document.