



Privacy and Personal Data Protection Policy Escuela Nueva Volvamos a la Gente

Preamble.- ESCUELA NUEVA VOLVAMOS A LA GENTE in compliance with the provisions of Law 1581 of 2012 and Regulatory Decree 1377 of 2013, implements its Privacy and Personal Data Protection Policy.

CHAPTER I GENERAL ASPECTS

FIRST: ESCUELA NUEVA VOLVAMOS A LA GENTE will implement all the actions at its disposal for the fulfillment of the protection and processing of personal data of which it is responsible or in charge, especially to protect the rights to privacy, the intimacy and good name and rights to know, update and correct the holders data collected on their databases or others managed by third parties. That is why this manual applies both to protect personal data that is currently collected and data that may be processed in the future, as well as for the processing of data of employees, suppliers, and contractors.

SECOND: PRINCIPLES.- In the processing of personal data that ESCUELA NUEVA VOLVAMOS A LA GENTE carries out, all the principles enshrined in Title II, Article 4 of the General Regime for the Protection of Personal Data, Law 1581 of 2012 and the rules that develop and complement it, are applied.

THIRD: CONSULTATION OF PERSONAL DATA PROCESSING POLICY. This policy is available to owners of personal data through the appropriate means of disclosure available to ESCUELA NUEVA VOLVAMOS A LA GENTE -with Tax ID N° 8000085056- as responsible or commander for the processing of personal data and at its headquarters on Calle 39 No. 21 - 57 in Bogota (Colombia), phone number (571) 7432216, e-mail contabilidad@escuelanueva.org, as well as on the website www.escuelanueva.org.

FOURTH: PERSONAL DATA PROCESSING.- The processing of personal data is done in the terms and scope of the authorization given by the owner/holder or under the application of special rules when any legal exception allows to do so.

FIFTH: RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA. ESCUELA NUEVA VOLVAMOS A LA GENTE acts as RESPONSIBLE for processing personal data under the direct collection of the owner/holder's data to: i) maintain labor relationships with its workers, preparation of employment contracts, link to the social security system and payment of salaries and social benefits. Also, to keep the staff continuously trained to face different issues related to their activity or for preparation for the performance of their duties; ii) develop research and improvements to the education model to achieve high levels of quality, efficiency and sustainability of education based on individuals in society; iii) make the payment of their financial, labor and legal obligations, iv) provide information to customers and users regarding the services provided in development of the social object, for which



information can be sent by electronic means, by telephone or personal contact with the owners; v) submit commercial proposals for the sale of products and services to natural or legal persons; vi) process requests through petitions, complaints or claims made by users or customers; vii) meet the administrative requirements of the district, departmental or national entities; viii) respond to the requirements made by judges of the Republic, conciliators, arbitrators and other entities with judicial functions, derived from legal actions that are promoted by or against ESCUELA NUEVA VOLVAMOS A LA GENTE, for which it has obtained the prior, informed and expressed consent of the data owners and those responsible for the processing of personal data, thus guaranteeing the rights to data protection.

SIXTH: DATA HOLDERS' RIGHTS.- According to the contemplated by the current regulations applicable to data protection, the following are the rights of the owners of personal data:

1. Access, know, update, rectify and delete their personal data facing ESCUELA NUEVA VOLVAMOS A LA GENTE on their condition of controller or data processor.
2. Request -by any valid means- proof of the authorization for the processing of data granted by the owner of the data or by the person in charge of processing personal data to ESCUELA NUEVA VOLVAMOS A LA GENTE.
3. Be informed by ESCUELA NUEVA VOLVAMOS A LA GENTE upon request, regarding the use they have given to their personal data.
4. Submit to Superintendence of Industry and Commerce complaints about violations of the provisions of the Law 1581 of 2012, before consultation or requirement to ESCUELA NUEVA VOLVAMOS A LA GENTE.
5. Revoke the authorization or request the deletion of data when the Constitutional and legal principles, rights, and guarantees are not respected in the treatment.
6. Free of charge access to their personal data that have been processed by ESCUELA NUEVA VOLVAMOS A LA GENTE, as responsible or in charge of the processing of personal data.

These rights may be exercised by:

- a. The owner/holder of personal data
- b. The persons entitled to the owner/holder of personal data
- c. The representative and/or agent of the owner of the personal data

SEVENTH: CONFIDENTIALITY AND SECURITY OF THE DATABASES. ESCUELA NUEVA VOLVAMOS A LA GENTE puts all the human, technical and technological resources at its disposal, doing the best to provide security and confidentiality to the personal data for which it is in charge or responsible for.

Regarding confidentiality, ESCUELA NUEVA VOLVAMOS A LA GENTE undertakes to sign confidentiality agreements with third parties when sealing agreements to share personal data to offer value-added services of legal, commercial, customer loyalty and services matters.



EIGHTH: AUTHORIZATION FOR THE USE OF PERSONAL DATA. ESCUELA NUEVA VOLVAMOS A LA GENTE as RESPONSIBLE for the processing of personal data acquired from the owners/holders the clear, prior, expressed, informed and free of defects authorization, through forms, data collection formats, electronic forms and other means available or possibly available for this purpose. Likewise, as MANAGER of data processing, it will obtain authorization of those responsible before the certification of the authorization of the holders granted to them, within the agreement to share personal data.

NINETH: AUTHORIZATION AND CONSENT OF THE HOLDER. ESCUELA NUEVA VOLVAMOS A LA GENTE will request the holders of personal data their authorization and will inform them in advance of the purpose for the processing of personal data, except in the following cases:

- a. Information required by a public or administrative entity in the exercise of its legal functions or by court order;
- b. Data of a public nature;
- c. Medical or health emergency cases;
- d. Treatment of information authorized by law for historical, statistical or scientific purposes;
- e. Data related to the Civil Registry of Persons.

TENTH: MEANS TO GRANT AUTHORIZATION. ESCUELA NUEVA VOLVAMOS A LA GENTE will obtain authorization through different means including physical, electronic documents, data message, Internet, websites, or any other format that in any case allows the holder's consent through unequivocal behavior through which it is determined that if the authorizations hadn't been given by the owner or the person entitled to it, the data wouldn't have been stored or captured in the database. The authorization will be requested by ESCUELA NUEVA VOLVAMOS A LA GENTE before the processing of personal data.

ELEVENTH: REVOCATORY OF THE AUTHORIZATION. Owners/holders of personal data may, at any time, revoke the authorization granted to ESCUELA NUEVA VOLVAMOS A LA GENTE to treat their personal data or request the deletion of it as long as it does not prevent it a legal or contractual provision. ESCUELA NUEVA VOLVAMOS A LA GENTE will establish simple mechanisms that allow the owner/holder to revoke their authorization or request the deletion of their personal data, at least by the same means by which they granted it.

For this, it should be noted that the revocation of consent may be expressed fully in relation to the authorized purposes, and therefore ESCUELA NUEVA VOLVAMOS A LA GENTE must cease any activity of data processing and partially in relation with certain types of treatment, in which case these will be the ones that will cease processing activities. In the latter case, ESCUELA NUEVA VOLVAMOS A LA GENTE may continue to process personal data for those purposes concerning which the owner/holder had not revoked his consent.



TWELFTH: GUARANTEES OF THE RIGHT OF ACCESS. To guarantee to the owner its right of access to the data, ESCUELA NUEVA VOLVAMOS A LA GENTE will make available the respective personal data through any suitable means, including electronic means that allow the direct access to the information.

THIRTEENTH: TREATMENT TO WHICH THE DATA AND ITS PURPOSE WILL BE SUBMITTED. The treatment of the data with whom ESCUELA NUEVA VOLVAMOS A LA GENTE established a relationship as RESPONSIBLE or established a relationship as MANAGER of data processing -in order to promote products and services derived from the exploitation of its corporate purpose, promote partnerships, purchase goods and services- will do so based on the requirements of Law 1581 of 2012 and Law 1266 of 2008 as applicable, and in general for the fulfilment of its corporate purpose. In any case, personal data may be collected and processed to:

1. Maintain labor relations with its workers, elaboration of employment contracts, entailment to the social security system, payment of salaries and social benefits. Also, to keep the staff in constant training regarding the different issues related to their activity, preparation for the performance of their duties.
2. Develop research and improvements in the educational model to achieve high rates of quality, efficiency, and sustainability of education focused on individuals.
3. Pay their financial, labor and contractual obligations.
4. Provide information to users and customers regarding the services they provide in the development of their corporate purpose, for which they can send information electronically or contact the owners through telephone or in-person.
5. Present commercial proposals for the sale of products and services to natural or legal persons.
6. To process the requests made by petitions, complaints or claims made by users or customers.
7. Attend the administrative requirements of the district, departmental or national entities.
8. Respond to the requirements made by judges of the Republic, conciliators, arbitrators and other entities with judicial functions, derived from legal actions that are promoted by or against ESCUELA NUEVA VOLVAMOS A LA GENTE.
9. Offer to the data owners/holders commercial information -products and services in general- provided by ESCUELA NUEVA VOLVAMOS A LA GENTE.
10. Develop the corporate purpose of ESCUELA NUEVA VOLVAMOS A LA GENTE according to its social statutes.
11. Share with allied companies, associated, branch offices, franchises, subsidiaries, and third parties who have signed agreements to share personal data for offering value-added services of a commercial and financial kind.
12. Do national or international transmission or data transfer with partner companies, suppliers and others that are required for the development of its corporate purpose.



FOURTEENTH: UPDATING THE DATA BASES. ESCUELA NUEVA VOLVAMOS A LA GENTE will update its databases permanently, in accordance with the provisions of Law 1581 of 2012.

FIFTEENTH: PROCESSING DATA OF CHILDREN AND ADOLESCENTS. In the processing of personal data, ESCUELA NUEVA VOLVAMOS A LA GENTE will ensure respect for the prevailing rights of minors (children and adolescents). In case of collecting it, it will comply with what is stated in Article 7 of Law 1581 of 2012.

SIXTEENTH: PRIVACY NOTICE. ESCUELA NUEVA VOLVAMOS A LA GENTE has a privacy policy which is an integral part of this Manual.

SEVENTEENTH: DATA TRANSFERS FOR TREATMENT BY NATIONAL AND INTERNATIONAL THIRD PARTIES. ESCUELA NUEVA VOLVAMOS A LA GENTE can transmit or transfer partially or totally the personal data to third parties in the country or abroad, in development of its corporate purpose for which it requests authorization from its owner and implements the necessary actions to comply with the legal precepts of Colombia, by signing agreements to share personal data.

CHAPTER II PROCEDURES

EIGHTEENTH: The procedures described below can only be exercised by the owner, their cause holders or representatives previously accrediting the confirmation of the identity or representation.

NINETEENTH: PROCEDURE FOR THE EXERCISE OF THE RIGHT OF THE HOLDERS OF PERSONAL DATA. In all procedures, the owners or their representatives must provide the following information: full name, ID type and number, Tax ID, citizenship card, address, phone number and city, copy of the RUT.

TWENTIETH: PROCEDURE FOR CONSULTATION ON THE PROCESSING OF DATA BY ITS HOLDERS.- ESCUELA NUEVA VOLVAMOS A LA GENTE provides the best means for the consultation, by the owners/holders of personal data, about the processing of their data, which will be informed within forms of the personal data collection or via e-mail.

The terms to resolve queries will be ten (10) working days from the date of its reception, according to what is stated in Article 14 of Law 1581 of 2012.

TWENTY-FIRST: PROCEDURE TO CORRECT, UPDATE, RECTIFY OR DELETE THE DATA.- ESCUELA NUEVA VOLVAMOS A LA GENTE, in compliance with the General Regime for the Protection of Personal Data, will proceed to correct, update, rectify or delete personal data at the request of the owner or its representative, under the terms indicated in the PROCEDURE FOR EXERCISING THE RIGHT OF PERSONAL DATA HOLDERS.



The procedure is set out in Article 15 of Law 1581 of 2012 and follows:

1. The claim shall be made by writing to ESCUELA NUEVA VOLVAMOS A LA GENTE, identifying the Holder, describing the facts giving rise to the claim, the address, and attaching documents that support the request. If the complaint is incomplete, the interested party will be required within five (5) days following the reception of the complaint to fix the mistakes. After two (2) months from the date of request, without the applicant presenting the required information it is going to be understood that the claim was abandoned.

If the person who receives the claim is not competent to solve it, he/she will transfer it to the appropriate official within a maximum term of two (2) working days and report the situation to the person concerned.

2. Once the complete claim is received, it will be included in the database a legend that says "claim in process" and its reason, in a term not exceeding two (2) working days. The legend should be maintained until the claim is solved.
3. The maximum term to address the claim will be fifteen (15) working days, from the day following the date of its reception. When it is not possible to meet the demand within that period, the person concerned will be informed of the reasons for the delay and the date on which the claim will be addressed, which in no case will exceed eight (8) working days following the expiration of the first period.

ESCUELA NUEVA VOLVAMOS A LA GENTE will train those responsible for the attention of inquiries and complaints about the procedural indicated by the law.

Paragraph: it will not process the request made by the owner or his representative of the deletion of personal data, when there is a legal or contractual duty for personal data to remain in the respective database.

TWENTY-SECOND: PROCEDURE FOR REVOKING AN AUTHORIZATION GIVEN TO ESCUELA NUEVA VOLVAMOS A LA GENTE TO TREAT PERSONAL DATA. The holder of personal data or their representative may revoke the authorization given to the processing of personal data, raising an application to its responsible or manager in terms of the PROCEDURE FOR EXERCISING THE RIGHT OF PERSONAL DATA HOLDERS.

TWENTY-THIRD: GUARANTEES OF ACCESS RIGHT.- ESCUELA NUEVA VOLVAMOS A LA GENTE guarantees the access right of the data subject, making it available at no cost, in detail, the respective personal data through appropriate means for that purpose

TWENTY-FOURTH: POLICY EFFECTIVENESS.- This policy is effective from the date of its publication and leaves no effect from other institutional arrangements that are contrary. What it's not covered in this manual shall be regulated according to the General Regime of Personal Data Protection in force in Colombia.

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