The COLEGIO ANGLO COLOMBIANO, in compliance with articles 15 and 20 of the Political Colombian Constitution, and Law 1581 of 2012 and other legal provisions, establishes the following personal data treatment policy, defining general guidelines for the treatment, storage, protection and administration of personal data legally obtained from students, parents, providers and employees, by means of different sources and stored in the Schools database subject to personal data protection and treatment.

Given that most of the data collected and shared is personal data of students under age, and pursuant to article 7 of Law 1581, the Parents of all minors or their legal tutors, are in charge of the correct management of the administration of the personal data of those they represent.

For this policy purpose, the information of COLEGIO ANGLO COLOMBIANO, is the following:

NIT: 860.009.107-0
MAIL: dataprotection@anglo.edu.co
DIRECCIÓN: Av. 19 N° 152 A-48
TELEPHONE: 57 (1) 2595700

RESPONSIBLE AREA

Enforcement of this policy and of all related legal requirements, as well as the obtaining and use of personal data is responsibility of the General and Academic Secretary. They can be contacted at dataprotection@anglo.edu.co.

DEFINITIONS

In accordance with article 3, Law 1581 of 2012 and other related legal provisions, the definitions are as follows:

a. Personal data: Any information related to one person or several determined people.

b. Sensible data: Those that affect the intimacy of the owner of the data or the information that if used incorrectly may cause any type of discrimination regarding race, political orientation, philosophical, political or religious beliefs; as well as data regarding health, sexual information or biometric data.

c. Public data: The data that is not considered semi private, private or sensible. Public data is all data related to marital status, profession and information related to work. By nature, public data may be included in public registers, documents and judicial rulings among others.
d. Responsible of the data treatment: Person or entity, private or public, who manages the personal data treatment by order of the responsible area;

e. Responsible of the Treatment: Person or entity, private or public, who to its own account or with the help of others, decides on database or data treatment;

f. Owner: Person who’s personal data will be part of the policy;

g. Authorization: Previous, express and informed consent of the Owner for the purpose of the treatment of the personal data collected;

h. Data Base: Organized group of personal data theta will be treated in accordance to this policy;

i. Treatment: Any operation or group of operations on personal data, such as recollection, storage, use, circulation and suppression.

j. Privacy Announcement: Verbal or written communication from the responsible, directed to the Owner regarding the treatment of personal data, informing on the existence of policies for the treatment of this information, access and purpose of use of collected data.

k. Transfer: Transfer of data takes place when the Responsible of personal treatment, in Colombia, send information or personal data to a third party who will be in charge of the correct use of the information, within the country or outside of it.

l. Transmission: Personal data treatment implying the communication of the data in the country or outside of it, related to the any type of treatment of the information by who is in charge by mandate of the responsible party.

TREATMENT, USE AND PURPOSE:

All data collected by COLEGIO ANGLO COLOMBIANO, directly or by means of the use of digital and technological platforms, will be used in general terms for the compliance and development of it’s purpose ensuring compliance of the legal principle of finality, stated in current legal provisions regarding personal data protection.

We do not sell, exchange or loan personal information to third parties. Nonetheless, we may share the information with other organizations or people with whom the Schools works or has any type of relationship, such as employees, contractors or partners that may carry out activities related to the School’s purpose and mission. In all cases, the School will inform that personal data must be used only for authorized purposes, always following optimal security conditions, as well as confidentiality as stated in this document and in applicable regulations.

Given the nature of school activities, personal data regarding financial information that Owners submit, will necessarily be shared with third parties that render financial services to the School such as financial evaluation and credit risk analysis. These parties are also bound by compliance with Law 1266/08, and may also carry out investigations in financial entities or risk analysis databases.

The school will enforce all necessary measures to ensure compliance of third parties with confidentiality and security of personal data, and correct use in accordance to what is stated in this policy regarding the treatment of personal data.
Personal data will also be used for:

- Registration of the information of employees, students, parents or tutors of underage students enrolled, in the database of COLEGIO ANGLO COLOMBIANO.

- Registration of contractors information in the COLEGIO ANGLO COLOMBIANO database, in compliance with the money laundering and terrorism financial aid control program, also for legal, labour, financial, accounting, payments, invoicing and tax purposes. As well as evaluation of client service.

- Filling of the Education Cooperation Agreement and other contracts or documents related to the admissions and enrolment process of candidates and students.

- Payment of contractual obligations.

- Sharing information with judicial or governmental entities when formally required.

- Sharing information to other educational institutions in Colombia and abroad, as required by the School’s families or tutors, in relation to the participation of students in activities related to the school’s programmes.

- Enrolment of students in Colombian or foreign tests where personal data is requires.

- Support in internal and external audits, of both Colombian and international certification or accreditation agencies.

- Effective communication and information control between the school and the parents or tutors and students, regarding academic or institutional issues, bursary services or debts, as well as authorizations for the participation of students in educational or student involvement in events (academic, cultural or sports).

- Access control of parents, tutors, students and employees.

- Data collection for the compliance of any duty mandatory to the School as responsible of the collected data.

- Ant other purpose that may result from the relationship between the Owner of the personal data and the school; or in compliance of a request or purpose authorized by the Owner of the personal.

The school will enforce all measures of privacy and confidentiality needed; and will comply with all principles that rule personal data treatment, including collection, use, treatment, storage and sharing of the personal data, as mandated in article 4 of the Habeas Data Law.

Since the majority of students is under age, the school will ensure respect of the superior interest and the fundamental rights of children when manipulating the personal data.

In addition, the sharing of personal data of minors, unless it is of public knowledge, will be restricted, taking into account the supremacy of children’s rights and the need to bring into consideration their opinion in accordance to the terms mandated by the Constitutional Court in the Ruling C.478/11.

Image Use

The use of images will be related directly to education, school publicity, showcase of activities led by the school with students participating as well as other members of the community. Also the photographs taken in other school activities that involve students and are authorized and take place
under school supervision and control. The use of these images is exclusive to COLEGIO ANGLO COLOMBIANO and they may be shared as a showcase to the activities held in accordance to the schools purpose.

These images may not be used for purposes different to those related to school activities and promotion.

Specifically, no user may take or share images of students to be published in web sites different to the school’s web site or with any third party that may sell them or use inadequately.

DATA TREATMENT LEGAL CONDITIONS

The COLEGIO ANGLO COLOMBIANO for the collection, storage, use, circulation and elimination of personal data requires express, free and informed consent of the Owner of the data.

Consent may be obtained by any of the communication channels referenced in this document that may be consulted and is of easy lecture, without technical barriers that may prevent access, and the information must be exact to that which is included in the database.

For this purpose the school has enabled the following channels to consult and inform changes:

- b. Mail: dataprotection@anglo.edu.co
- c. Personalized attention: In School.
- d. Telephone: (1) 2595700

Through these communication channels you may:

- a. Consult and inform changes of personal data.
- b. Request data consultation.

Authorization of the Owner will not be necessary when information is requested by a public or administrative entity in compliance with legal purposes or by court order; when it is public data, sanitary or medical urgent matters; information treatment authorized by law for historical, statistical or scientific purposes; data related to civil registry of people.

If the Owner requests copy of the information collected by the school, copy will be given and the school must file proof of compliance.

COLEGIO ANGLO COLOMBIANO will share information only if the person who requests it are authorized in accordance to legal requirements.

PERSONAL DATA OWNERS RIGHTS:

As mandated by the Habeas Data Law, Owners of personal data have the following rights:

- a. Be informed of the use given by the Responsible party, of the personal data collected;
- b. Know, update, correct personal data with the Responsible of the treatment or those in charge. This right may be exercised regarding partial, incomplete, inexact or fractioned data; or data that may lead to error or who’s treatment is prohibited or not authorized by the Owner;
c. Request proof of the authorization given to the Responsible of the Treatment, unless the authorization is not necessary as a requirement for the data use, in accordance to article 10 of Habeas Data Law;

d. Withdraw authorization or request the exclusion of data when the treatment does not respect the principles, rights, legal and constitutional guarantees. Withdrawal or exclusion will proceed when the Industry and Commerce Superintendence established that the Responsible party or who is in charge acted contrary to legal provisions;

e. Access with no cost, to their personal data that have been collected and used in accordance with the Treatment.

f. File claims for infractions to what is stated in Law 1581 of 2012, and related rulings, with the Industry and Commerce Superintendence.

Ownership of all personal data is of the Owner and only they can decide regarding the data.

PERSONAL DATA TREATMENT PROCEDURES

Any question, request (data subtraction, rectification, up date, request) or claim related to this policy or with the treatment and use of personal data shared by Owners or tutors, may be directed to the person Responsible of the Treatment in School by means of a telephone call or e-mail; or by means of the suggestions box in the school website.

COLEGIO ANGLO COLOMBIANO will provide all information included in its database and related to the identification of Owners, by any of the communication channels in force in this personal data policy; and will maintain proof of this information.

Terms:

• All requests, complaints and claims will be addressed in a maximum of ten (10) working days, counted as of the date of the receipt.

• If the request, complaint or claim may not be addressed within those terms, the school will inform the concerned party, explaining the reason that motivate the delay and the date the request will be answered. The new term cannot be of more than five (5) working days later than the initial term is due.

Process:

The petition through which the request, complaint or claim is submitted must include, at least, the name of the Owner, the description of the facts that originate the request, complaint or claim, the address or e-mail where the answer should be notified and any document that supports the petition.

If the information is incomplete, the school will request the interested party to complete information within the five (5) following days to the receipt of the petition; if following two (2) days after the school’s request, the interested party does not complete the information requested, it will be understood that the third party has withdraws the petition.

1. If who receives the claim is not qualified to resolve the issue, the claim must be transferred to whoever is responsible within the following two (2) days of the receipt and will inform the interested party of the transfer.
2. Once the claim received is complete the School has two (2) days to include the phrase “claim in review”, together with the grounds of the claim. This phrase must be left in the database until the matter has been solved.

3. The School counts with fifteen (15) workdays to solve the claim, counted as of the day after the receipt. If the claim cannot be answered or solved within that period of time, the School will inform the interested party the reasons for the delay and the date it will be solved; the new date cannot be more than eight working days (8) days after the initial due date.

4. Nonetheless, the request for elimination of information and authorization withdrawal will not proceed if the Owner has a legal or contractual duty to remain in the database.

COLEGIO ANGLO COLOMBIANO will ensure the existence of, free and easy to access, mechanisms to file the request for elimination of information and authorization withdrawal given.

If the deadline is reached and the School has not eliminated the personal data upon request by the Owner or an interested third party, they may request the Industry and Commerce Superintendence to order the withdrawal of the authorization and the deletion of personal data.

COLEGIO ANGLO COLOMBIANO will apply the procedure described in article 22 of Law 1581 of 2012. And will ensure that all technical, human and administrative measures necessary to ensure the security to all registers, preventing loss, adulteration, unauthorized or fraudulent access or use, be set.

**Requisite of Procedure:**

When the Owner or interested party wants to pursue a claim before the Industry and Commerce Superintendence, regarding the personal treatment followed by COLEGIO ANGLO COLOMBIANO, there must be proof that the procedure for complaints, claims and requests was followed with the school first, as stated in the applicable legal regulations regarding personal data protection.

DATABASE NATIONAL REGISTRY: COLEGIO ANGLO COLOMBIANO will classify the information included in it’s database, which will be registered and updated in the Database National Registry (RNBD) of the Industry and Commerce Superintendence, this information will be subject to personal data treatment as well as this policy. All databases registered by the School will be in force during the existence of the School.

Raymond Williams

Representante Legal

Fecha de adopción: 13/03/18 (Acta 253/18)