

PERSONALES POLICY AND PROCEDURE FOR THE PROTECTION AND TREATMENT OF PERSONAL DATA

ESPAÑOL CULTURA OCIO y SALSA Escuela de Español S.A.S. (ECOS Escuela de Español)

In compliance with the provisions of:

Law 1581 of 2012, which establishes general provisions for the Protection of Personal Data

Decree 1377 of 2013 that regulates said law

And, as an essential obligation, the Protection and Security, by ECOS Escuela de Español S.A.S., of the personal data of employees, candidates for employees, clients, visitors and suppliers, is specifically specified, according to the internal protocol that is stipulated and governed by the following principles:

- Ensure that the personal data processed are adequate and pertinent for the legitimate purposes for which they were obtained, that they are kept accurate and up-to-date and that they are canceled when they no longer serve the purpose for which they were requested.
- Provide the owner of the data with the exercise of their rights to know, update, rectify and delete their personal information.
- Ensure that access to the data corresponds to authorized users and under the commitment to process the data only for the purposes authorized by the owner of the data and maintain the confidentiality and adequate level of security of personal data.

ESPAÑOL CULTURA OCIO y SALSA Escuela de Español S.A.S. (ECOS Escuela de Español) as a legally constituted company, and in the terms established in the current regulations, acts as **RESPONSIBLE FOR THE PROCESSING** of Personal Data through the Reception, Administration and Management areas for the management of the database of all the employees, candidates for employees, Clients, visitors and Suppliers of the company.

These dependencies must comply with the function of personal data protection, and must process the requests of the Holders, in the terms, terms and conditions established in this procedure, for the exercise of the rights of access, consultation, rectification, update, deletion and revocation referred to in the current regulations on personal data protection.

To facilitate the fulfillment of these formal obligations, this Procedure is established, which must be known and complied with by all personnel, labor or external, whether or not they have access to personal data allowed.

I. OBJECTIVE

Inform Employees and Third Parties who have provided their personal data to the School about the Personal Information Treatment policy and allow the Owners of said data to exercise their right of Habeas Data, establishing the necessary procedure that they must follow if they wish to know, update and rectify the data found in the databases.

II. INFORMATION PROCESSING POLICY

ECOS Escuela de Español S.A.S. guarantees the protection of rights such as Habeas Data, privacy, intimacy, good name, image, for this purpose all actions will be governed by principles of good faith, legality, computer self-determination, freedom and transparency.

Whoever, in the exercise of any labor, commercial, civil activity or of any legal nature, whether permanent or occasional, may provide any type of information or personal data to ECOS Escuela de Español S.A.S. and in which it acts as the person in charge of the treatment or responsible for the treatment, it will be able to know it, update it and rectify it.

III. LEGAL FRAMEWORK

- Political Constitution, article 15.
- Law 1581 of 2012 (Habeas Data).
- Regulatory Decrees 1727/2009, 2952/2010 and Regulatory Decree 1377/2013.
- Sentences of the Constitutional Court C – 1011 of 2008, and C - 748 of 2011

IV. REACH

This procedure will be applied to all databases and/or files containing personal data that are processed by ECOS Escuela de Español S.A.S. as responsible for the processing of personal data. It covers all areas where information processing is required in any medium. It applies to all company officials, direct or on mission, who have access to sensitive information, or information that the School defines as confidential.

Use and purpose of treatment

Personal data is used to:

Execution of the contract signed between the parties

Payment of contractual obligations

Sending information to government or judicial entities at the express request of the same

Support in external/internal audit processes

Sending/Receiving messages for commercial, advertising and/or customer service purposes

Registration of the information of the candidates, clients, employees and suppliers in the company's database

Contact with candidates, clients, employees or suppliers to send information related to the contractual, commercial and obligatory relationship that takes place

Collection of data for the fulfillment of the duties that as Responsible for the information and personal data, corresponds to the company

For security or fraud prevention purposes

To provide effective customer service

Any other purpose that results in the development of the School.

Visitor registration information

For purposes of advertising campaigns and marketing

The information provided will be used only for the purposes indicated here, and ECOS Escuela de Español S.A.S. will not proceed to sell, license, transmit or disclose it outside the company unless: 1. it is expressly authorized to do so, 2. it is necessary to allow contractors or agents to provide the services that we have entrusted to them, 3. with the in order to provide products or services, 4. is disclosed to entities that provide marketing services on behalf of ECOS Escuela de Español S.A.S. or to other entities with which they have joint marketing agreements, 5. is related to a merger, consolidation, acquisition, divestiture or other restructuring process or 6. is required or permitted by law.

In order to carry out the purposes described above, personal data may be disclosed for the purposes set forth above to human resources personnel, managers, consultants, advisors, and other persons and offices as appropriate.

V. SENSITIVE DATA PROCESSING

Requirement for the treatment of Sensitive Data

Data classified as sensitive may be used and processed when:

- The Holder has given his explicit authorization to said treatment, except in cases where the granting of said authorization is not required by law.
- The Processing is necessary to safeguard the vital interest of the data subject and the data subject is physically or legally incapacitated. In these events, the legal representatives must grant their authorization.
- The Treatment is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other non-profit organization, whose purpose is political, philosophical, religious or trade union, provided that they refer exclusively to its members or to people who maintain regular contact by

reason of its purpose. In these events, the data may not be provided to third parties without the authorization of the owner.

- The Treatment refers to data that is necessary for the recognition, exercise or defense of a right in a judicial process.
- The Treatment has a historical, statistical or scientific purpose. In this event, the measures leading to the suppression of the identity of the Holders must be adopted.

Authorization of the Holder

Without prejudice to the exceptions provided by law, the treatment requires the prior, express and unequivocal authorization of the owner, which will be obtained through the AUTHORIZATION FORMATS FOR THE MANAGEMENT AND USE OF PERSONAL DATA for Employees and for Clients and Suppliers, depending of the purposes of the treatment, which may be subject to consultation and subsequent verification.

Cases in which authorization should not be requested

Article 10 of Law 1581 of 2012, specifically establishes the cases in which express authorization of the owner should not be requested:

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

VI. RIGHTS OF CHILDREN AND TEENAGERS

In the Treatment, respect for the prevailing rights of minors will be ensured. In accordance with the legislation, the Processing of personal data of minors is prohibited, except for those data that are of a public nature.

It is the task of the State and educational entities of all kinds to provide information and train legal representatives and guardians on the possible risks faced by minors regarding the improper treatment of their personal data, and provide knowledge about the responsible use and safe by children and teenagers of their personal data, their right to privacy and protection of their personal information and that of others.

VII. ECOS Escuela de Español S.A.S. DUTIES AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

ECOS Escuela de Español S.A.S., when acting as Responsible for the Processing of personal data, will comply with the following duties:

- Guarantee the Holder, at all times, the full and effective exercise of the right of habeas data.
- Request and keep a copy of the respective authorization granted by the owner.
- Duly inform the holder about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Guarantee that the information provided to the data processor is truthful, complete, accurate, up-to-date, verifiable and understandable.
- Update the information, promptly communicating to the person in charge of the treatment, all the news regarding the data that has previously been provided and adopt the other necessary measures so that the information provided to it is kept up to date.
- Rectify the information when it is incorrect and communicate what is pertinent to the person in charge of the treatment.
- Inform at the request of the Owner about the use given to their data.
- Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the Holders' information.

VIII. AVISO DE PRIVACIDAD NOTICE OF PRIVACY

The Privacy Notice is the physical document, electronic or in any other format, made available to the owner to inform them about the processing of their personal data. Through this document, the owner is informed of the information related to the existence of the information treatment policies of **ECOS Escuela de Español S.A.S.** and that will be applicable, the way to access them and the characteristics of the treatment that is intended to be given to personal data.

IX. RIGHTS AND CONDITIONS OF LEGALITY FOR THE PROCESSING OF DATA OF THE HOLDERS

In accordance with the provisions of article 8 of Law 1581 of 2012, the Holder of personal data will have the following Rights:

- Access, know, rectify and update your personal data against.
- By any valid means, request proof of the authorization granted to ECOS Escuela de Español S.A.S. in its capacity as Data Controller.
- To receive information from **ECOS Escuela de Español S.A.S.** Upon request, regarding the use you have given to your personal data.
- Go before the legally constituted authorities, especially before the Superintendence of Industry and Commerce, and file complaints for violations of the provisions of the current regulations in the applicable standards, after consulting or requesting the Treatment Manager.
- Modify and revoke the authorization and/or request the deletion of the data when the current constitutional and legal principles, rights and guarantees are not respected in the Treatment.
- Be aware of and have free access to your personal data that has been subject to Processing.

X. PROCEDURE FOR INQUIRIES, CLAIMS AND DATA RECTIFICATION AND UPDATING

At any time and free of charge, the owner or his representative may request the Person Responsible for the Processing of Personal Data at **ECOS Escuela de Español S.A.S.**, the rectification, updating or deletion of his personal data, after proof of his identity..

The areas of ECOS Escuela de Español S.A.S. Responsible for the attention of queries, requests and claims before which the Holder can exercise their rights to know, update, rectify or revoke the authorization in the terms of law, will be the following:

- **Reception**
- **Administration**
- **Management**

XI. Procedures and Requests

The holder, his legal representatives, authorized third party or proxy may consult, submit claims, rectify and update information, delete data and/or revoke his authorization on the personal information of the Holder that rests in any database. Consequently, **ECOS Escuela de Español S.A.S.** will guarantee these rights, providing all the information contained in the individual record or that is linked to the identification of the Holder and taking into account the considerations for which this information must be subject to

correction, updating, deletion, or review of alleged breach of any of the duties contained in the Law.

To exercise this right, the owner, their legal representatives, authorized third party or attorney-in-fact may formulate their procedure through:

Physical written communication (delivered in the reception area) or electronic (addressed to info@ecos-spanishschool.com) that must contain at least the date of request, address, email and telephone for notification purposes.

Whatever the means used to exercise these rights **ECOS Spanish School S.A.S.** will attend the request as long as the following requirements are met:

Holder: Written communication accompanied by a photocopy of the Identity Document.

- Legal Representative / Authorized Third Party / Proxy: Written communication, Letter of authorization or document proving the representation, Identification Document of the Holder and of the authorized person.
- In requests for rectification and updating of personal data, the owner must indicate the corrections to be made and provide the documentation that supports their request.

These requests will be addressed within a maximum term of ten (10) business days from the date of receipt. When it is not possible to attend the query within said term, the interested party will be informed before the expiration of 10 days, stating the reasons for the delay and indicating the date on which his query will be attended, which in no case may exceed five (5) business days following the expiration of the first installment.

If necessary, additional information will be required from the applicant, and if two (2) months have elapsed from the date of the request, the applicant has not submitted the required information, it will be understood that the process has been withdrawn.

XII. USE, TRANSFER AND INTERNATIONAL TRANSMISSION OF PERSONAL DATA AND PERSONAL INFORMATION BY ECOS Escuela de Español S.A.S.

Depending on the nature of the permanent or occasional relationships that any Person Holder of personal data may have with **ECOS Escuela de Español S.A.S.** all of their information may be transferred abroad, subject to the applicable legal requirements, with the acceptance of the This policy expressly authorizes the transfer and/or transmission of Personal Information. The information will be transferred and/or transmitted, for all relationships that may be established with **ECOS Escuela de Español S.A.S.**

Without prejudice to the obligation to observe and maintain the confidentiality of the information, **ECOS Escuela de Español S.A.S.** will take the necessary measures so that these third parties know and agree to observe this Policy, under the understanding that the personal information they receive, only may be used for matters directly related to your

connection to **ECOS Escuela de Español S.A.S.** and only while it lasts, and may not be used or intended for a different purpose.

ECOS Spanish School S.A.S. You may also exchange Personal Information with other government or public authorities (including, but not limited to, judicial or administrative authorities, tax authorities, and criminal, civil, administrative, disciplinary, and fiscal investigation agencies), and third parties involved in civil legal proceedings and their accountants, auditors, attorneys, and other advisors and representatives, because it is necessary or appropriate:

- To comply with applicable laws, including laws other than those of the country of residence.
- To comply with legal processes.
- To respond to requests from government and public authorities and to respond to requests from government and public authorities other than those of the country of residence.
- To enforce company terms and conditions.
- To protect company operations.
- To protect the rights, privacy, security or property of the company, the Owner or Third Parties.
- Obtain the applicable compensation or limit the damages that may affect the company.

XIII. VALIDITY OF THE DATABASES

The Personal Data included in the databases subject to Treatment, will remain and will be treated based on the criterion of temporality for the contractual term of the product or service, and/or during the period in which the purpose for which it exists subsists. were collected, plus the term established by law.