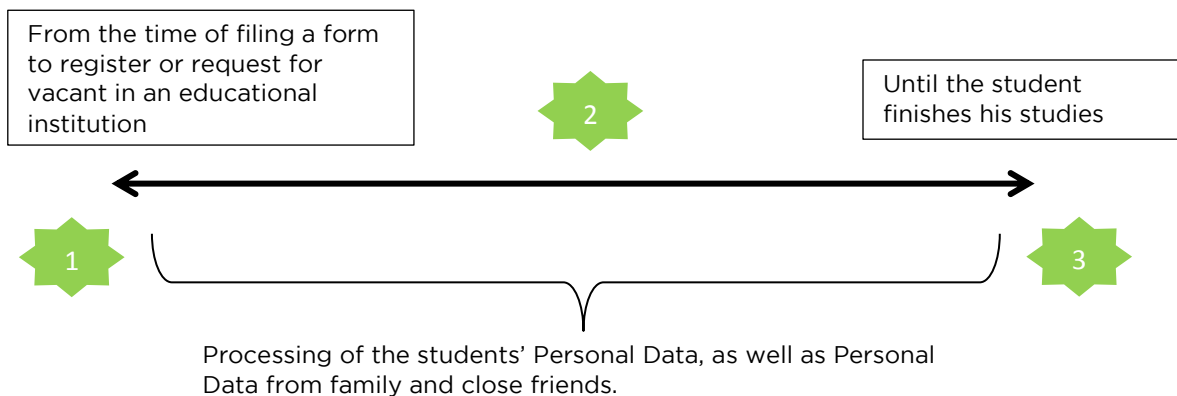


The Superintendency of Industry and Commerce issued the Guideline for the Processing of Personal Data in the domain of Public and Private Education

Through the Guideline for the Processing of Personal Data in domain of Public and Private Education, the Superintendency of Industry and Commerce instructs institutions and centers of formal and informal education, about the way they have to handle personal data from students, in the different moments in which Personal Data is collected, as follows:



The Guideline mentions that, for compliance with the Data Protection regulation, institutions have to comply with the following, in each moment of the Processing of Personal Data:

1. **Registration:** the forms have to include a consent form that is clear and didactic. The data collected must be adequate, pertinent and not excessive for the purpose of their collection. Consent from family must be requested for the processing of their Personal Data, unless the information collected is of a public nature.

2. **During the studies (academic files):** the data must be adequate, pertinent and not excessive for the profiling of students, in accordance to the educational service being provided. The information must always be updated and (i) only the personnel that has a close relationship with the academic process should have access to such personal data; (ii) regarding sensitive data, only the personnel that processes such information for the exclusive purposes for which it were collected, should be granted access; and (iii) measures to guarantee conservation and high levels of security of academic files must be implemented.
3. **When students finish their studies:** the information must be conserved for an adequate time, depending on the purposes for which it was collected and, if the institution pretends to keep the information for an indefinite time, it has to inform this situation to data subjects.

Additionally, the Guideline establishes that when financial aids and scholarships are being granted, Data Protection regulation must be complied with, since such processes necessarily imply the Processing of Personal Data.

We will be pleased to clarify and discuss the above information. Please contact Ernesto Cavelier in Bogota at the e-mail ernesto.cavelier@phrlegal.com, Hernán Panneso in Bogota at the e-mail hernan.panneso@phrlegal.com, or María Angélica de la Hoz at the e-mail maria.delahoz@phrlegal.com, or at the phone number +571 3257300.