

PERSONAL DATA PROTECTION POLICY

American School of Quito is an educational institution focused on educating and forming with excellence in an environment of freedom, responsibility and democracy human beings with integrity committed to their wellbeing, that of society and the environment.

By using our services, contacting us, establishing relationships and managing information, you entrust us with your personal information. We are committed and understand that this is a great responsibility and we make every effort to protect you in the use of your personal information.

The main objective of this Personal Data Protection Policy (hereinafter "Policy") is to guarantee your right to be informed about the treatment that American School of Quito Foundation performs on your personal data in the databases that we manage. You, as a student, parent, collaborator, supplier, among other living natural persons who maintain a relationship with the Foundation, through any of the channels or means you use to interact with us, have the right to be informed about what personal data we collect, why and for what purpose we collect it, its storage, conservation, use, transfer and termination, as well as the way in which you can exercise your rights. We therefore ask you to read this Policy carefully and in its entirety. In addition, please remember that you can always contact us when you have questions or concerns through our support channels.

Through this Policy we seek to strengthen our relationship of commitment and trust with the holders of personal data, fulfill our duty of transparency and ensure that our processes and the educational services we offer comply with the principles defined in the Organic Law for the Protection of Personal Data (LOPD), to perform any processing of personal data of each holder. For example: transparency, confidentiality, security, relevance and minimization and also complies with the regulations applicable to the processing of personal data.

1. IDENTITY AND CONTACT DETAILS OF FCAQ AS PERSONAL DATA CONTROLLER

American School of Quito Foundation is responsible for the handling of data, according to the Organic Law of Personal Data Protection, hereinafter LOPDP, which is why we make available our identity, address and contact information:

- **RUC:** 1790100588001
- **Address:** Manuel Benigno Cueva, N80-190, Urb. Carcelén
- **P.O. Box:** 17-01-157
- **Phone:** (593) 3976 300

Telephone numbers:

- **Secretary Primary:** 099 123 1111
- **Secretary Secondary:** 096715 8888/096713 8888
- **Secretary International:** 096 724 8888

2. KEY TERMS

The following definitions, established in the Organic Law on Personal Data Protection, are added. For questions about this Policy, please contact us through our customer service channels, described in the previous section.

- **Data subject:** Living natural person whose data is the subject of processing.
- **Personal Data:** Data that identifies or makes identifiable a natural person, directly or indirectly.
- **Responsible for the processing of personal data:** Natural or legal person, who alone or jointly with others decides on the purpose and processing of personal data.
- **Personal data processor:** Natural or legal person, public or private, who alone or jointly with others processes personal data on behalf of and for the account of a controller.
- **LOPDP:** Organic Law on Personal Data Protection

3. IDENTITY AND CONTACT DETAILS OF THE PERSONAL DATA PROTECTION OFFICER

American School of Quito Foundation requires a permanent and systematized control due to the volume, nature, scope and purposes of processing activities and personal data used. Therefore, we have to appoint a Delegate for Personal Data Protection (DPD), to ensure or supervise compliance with the LOPDP and serve as a point of contact with the owners in relation to the processing of their personal data for the exercise of their rights and with the Control Authority.

To establish contact with the DPD, please contact us through the following means:

Primary National: primaria_nacional@fcaq.k12.ec

Primary International: primary_international@fcaq.k12.ec

Secondary National: secundaria_nacional@fcaq.k12.ec

Secondary International: secundaria_internacional@fcaq.k12.ec

Human Resources: rrhh@fcaq.k12.ec

Suppliers: gerencia@fcaq.k12.ec

Applicant Families and Alumni: admisiones@fcaq.k12.ec

4. PURPOSE OF THE USE OF PERSONAL DATA

For the proper operation and execution of educational services, Fundación Colegio Americano may process personal data for the following purposes:

Data of students, former students, candidates for admission, parents and legal guardians:

- Development, drafting, fulfillment and execution of the tuition contract.
- Transactions such as tuition payments.
- Student and parent attention through any of the available channels, such as, for example: website, apps, chats, or social networks.
- Identification, authentication and updating of personal data, to perform validations of the veracity of the information provided.
- Verification of profile, payment capacity, fulfillment of obligations and/or patrimonial solvency of the parents.
- Operational processes of the Foundation such as: accounting and invoicing, processing of information for quality management, conducting audits and monitoring of action plans.
- Attention to judicial, extrajudicial and/or administrative requirements and procedures.
- Execution and communication of orders from competent authorities and preservation of personal data for judicial investigation purposes.
- Collection of personal data in image, audio and/or video format for the elaboration of communication and dissemination products.
- Marketing and direct communications.
- Communications regarding changes in contract/service conditions, newsletters/advertisements.
- Communication to offer and contract assistance services provided by third parties.
- Communication through social networks, Foundation platforms or messaging about the current affairs of the members of the educational community in the form of text, image, audio or video.
- Contact availability for institutional relations.
- Management of activity records and elaboration of personal data modeling.
- Satisfaction evaluation of services provided.
- Administration of databases and servers for service management, as well as for information security management.
- Administration of mobile devices.

- User data analysis: In information security management, analyses of user data can be performed to detect patterns and anomalies in the use of information systems and resources. This involves the processing of personal user data, such as names, email addresses, IP addresses, and activity logs.
- Security data analysis: To improve information security, security data analysis of information systems and resources can be performed. This involves processing personal data of users and other data subjects, such as names, e-mail addresses, activity logs, and other information relevant to information security management.
- Identification of personal data risks: In the context of risk management, security risks can be identified by analyzing personal data of data subjects. This involves the processing of personal data, such as names, e-mail addresses, activity logs, and other information relevant to the identification and management of security risks.
- Video surveillance.
- Application development that takes into account user preferences, to create a personalized experience and the performance of software testing and debugging.
- Physical, technological and information security awareness campaigns.
- Internal communication.
- Training in initial education, Primary and Secondary.
- Any other that is mandatory or necessary in the fulfillment of the Foundation's legal obligations.
- Use and deliver information and personal data such as contact data for commercial, advertising, data analysis or communicational purposes of products or services of its allies through the different communication channels.

Data on suppliers and potential suppliers:

- Relationship management with data processors for the development of operational and educational activities.
- Operational processes of the Foundation such as: accounting and invoicing, conducting audits and monitoring action plans.
- Management and qualification of suppliers and contacts.
- Support to incidents due to business continuity.
- Prevention of money laundering and crime financing.

Data on associates and potential associates:

- Management of the development, assignment, measurement and monitoring of performance indicators.
- Administrative management of incorporation to the Foundation.
- Administrative and payroll management of the collaborator.

- Performance evaluation and work environment
- Training, induction, education and awareness raising.
- Recruitment and hiring.
- Accident management and occupational risk prevention.
- Management of labor procedures.
- Employee attention.
- Prevention of money laundering and crime financing.
- Occupational health and safety.
- Public and private social benefits.

5. CATEGORIES OF PERSONAL DATA

To achieve the purposes described, American School of Quito Foundation, performs personal data processing, i.e.: in an automated, partially automated and non-automated way, collects, compiles, obtains, records, organizes, structures, preserves, safeguards, adapts, modifies, eliminates, indexes, extracts, consults, elaborates, uses, takes advantage of, sessions, enables, distributes, communicates, transfers, collates, interconnects, limits, suppresses, destroys, blocks the following personal data:

- Special categories of personal data (sensitive, of children and adolescents, of persons with disabilities and their substitutes, health, credit and deceased persons).
- Sensitive data related to: ethnicity, gender identity, cultural identity, religion, ideology, political affiliation, judicial history, immigration status, sexual orientation, health, biometric data, genetic data and those whose improper treatment may give rise to discrimination, violate or may violate fundamental rights and freedoms.
- Identity and identification data including passwords and signatures.
- Contact and communications data.
- Demographic data.
- Product and service data.
- Transactions for goods and services.
- Generated, transactional and statistical data.
- Employment details.
- Social circumstances.
- Academic and professional.
- Economic, financial and insurance including credit data.
- Business information and references.
- Traffic and location data.
- Metadata.

- Unique identifiers.
- Navigation data.

This personal data is obtained in a lawful and legitimate manner by virtue of the fact that it comes from the following sources:

- Directly from the Holder.
- Data from publicly available sources such as the media, telephone directories and professional associations.
- Data obtained from public registries, public administration databases, and official lists for the prevention of fraud, money laundering and financing of terrorism.
- From third parties that have lawful legitimating bases and consents granted by the Holder of the personal data.
- From third parties that have collected personal data prior consent of the Holder to comply with the provision of complementary services.
- Derived from the use of systems, platforms, websites, applications, chats or social networks to perform behavioral profiling.

In accordance with the principle of minimization and proportionality, the processing of personal data shall be adequate, relevant and limited to those necessary according to the purposes for which they are processed. That is, personal data will be collected and processed depending on the processes or services that the Holder uses, has contracted or must comply with in accordance with current regulations, as well as additional processing permitted or authorized by the same holder, so we inform that certain services may involve the processing of other categories of data not included in this list, which you can view by accessing each process or service.

6. LEGAL BASIS FOR PROCESSING

The processing of personal data carried out by American School of Quito Foundation is lawful and legitimate in accordance with the provisions of:

Article 66 numeral 19 of the Constitution of the Republic of Ecuador recognizes the right to the protection of personal data, *"(...) which includes the access and decision on this type of information and data of this nature, as well as its corresponding protection. The collection, filing, processing, distribution or dissemination of such data or information shall require the authorization of the owner or the mandate of the law. (...)".*

Article 7 paragraphs 1, 2, 3, 5 and 8 of the Organic Law for the Protection of Personal Data, which determines the conditions for a legitimate processing of personal data and establishes that it will be legitimate when at least one of the following conditions is met:

1. Consent of the Holder for one or more specific purposes obtained legitimately through unchecked boxes through the various channels of care.

2. Fulfillment of a legal obligation, in particular that applicable to the educational sector.
3. Compliance with a court order, and the principles of the present law must be observed.
5. For the execution of pre-contractual measures at the request of the Holder or for the fulfillment of contractual obligations pursued by the data controller, data processor or a legally authorized third party.
8. To satisfy a legitimate interest of the data controller or of a third party, provided that the interests or fundamental rights of the data subjects do not prevail.

Personal data may be processed in a legitimate and lawful manner when there is at least one legitimate basis, but it is also possible to have two or more, which only reinforce the commitment of the American School of Quito Foundation to comply with the LOPDP and the applicable regulations in force.

7. INFORMATION ABOUT COOKIES AND DATA STORAGE AND/OR RETRIEVAL DEVICES

The Foundation's websites and applications collect standard log information, including your IP address, browser type, language, access times and website addresses.

To ensure that the Foundation's websites and applications are being well managed and to facilitate better navigation, we or our service providers may use cookies or data storage and/or retrieval devices to collect aggregate data.

8. CONSERVATION

Personal data will be stored solely and exclusively for the time strictly necessary to comply with the purposes of use or purpose of each treatment; for the time necessary to comply with the obligations arising from legal, labor or contractual relationships, as appropriate; to meet possible liabilities that may arise from the fulfillment of the purposes for which the data were collected; for the legal times provided in the applicable rules and a maximum of the time necessary for the prescription of legal actions. Therefore, a copy may be kept, with the data duly blocked, as long as liabilities may arise from the performance of the service or pending legal statute of limitations.

After these conditions have been fulfilled or the data retention period has expired, the data will be deleted, for which the respective destruction certificates must be issued.

9. TRANSFERS AND COMMUNICATIONS OF PERSONAL DATA

We transfer personal data locally or internationally to suppliers, users and customers only for the purposes informed in this Policy, upon verification of the existence of a legitimate basis and applying appropriate security measures.

Personal data may also be disclosed to authorities, governmental regulatory or other agencies, or third parties, if necessary to comply with obligations or requirements of the competent authority.

American School of Quito Foundation will require third parties to whom personal data is transferred to comply with appropriate standards of confidentiality, protection and security of these, and especially when such third parties are located in countries that do not have adequate data protection legislation in accordance with the parameters established by the applicable regulations in each jurisdiction for which agreements or legally valid agreements will be signed to establish mandatory between the parties, sufficient and adequate guarantees of the application of functional, technological, organizational, administrative and legal measures to ensure levels of personal data protection that reflect the standards imposed by the LOPDP on personal data protection and information security.

10. SECURITY

All our services include robust security features to ensure the confidentiality, availability and integrity of personal data, which protect personal information in a structured, systematic and permanent way, allowing us to detect and block security threats in a timely manner and mitigate their risks and impact. If we detect any risk, the Foundation's personal data protection delegate, through e-mail communication, will contact the Holders of personal data to inform about the security measures we maintain and also indicate the steps to be taken to improve data protection. We make every effort to protect personal data from any security breach.

To this end, and taking into account the state of the art and the nature of the processing, as well as risks to fundamental rights and freedoms, we apply appropriate functional, technological, organizational, administrative and legal measures to ensure a level of security appropriate to the risk, aimed at maintaining the permanent confidentiality, integrity and availability of the systems and services of personal data processing and access to personal data, quickly in case of incidents.

11. RIGHTS OF ACCESS, RECTIFICATION AND UPDATING, ELIMINATION, SUSPENSION AND OPPOSITION

The Holder of personal data has the right to request from American School of Quito Foundation, access, rectification and updating, deletion, opposition, portability, and suspension and not to be subject to a decision based solely or partially on automated assessments of personal data.

Some of these rights will apply in certain circumstances:

Access: The data subject has the right to ask whether we are processing personal data and, if so, to request access to it. This allows him/her to receive a copy of the personal data and certain other information about it.

Rectification: The Holder has the right to request that any incomplete or inaccurate personal data be corrected.

Updating: The Holder has the right to request the updating of all personal data that is no longer current.

Elimination: The Holder has the right to request that we delete personal data when:

1. The handling does not comply with the principles established in the LOPDP;
2. The processing is not necessary or relevant for the fulfillment of the purpose;
3. The personal data have fulfilled the purpose for which they were collected or processed;
4. The term of conservation of the personal data has expired;
5. The treatment affects fundamental rights or individual liberties;
6. Revoke the consent given or indicate that consent has not been given for one or more specific purposes, without the need for any justification; or,
7. There is a legal obligation.

In addition, there are certain exceptional cases in which we may refuse a request for deletion, for example, when the personal data is necessary for compliance with the law or in connection with claims.

Suspension: The Holder has the right to request the suspension of processing when any of the following conditions are met:

1. When you contest the accuracy of the personal data, while the data controller verifies the accuracy of the personal data.
2. The processing is unlawful and the Holder opposes the deletion of the personal data and requests instead the limitation of its use.
3. American School of Quito Foundation no longer needs the personal data for the purposes of the processing, but the Holder needs them for the formulation, exercise or defense of claims.

There are certain exceptions where a request for suspension will be refused, for example, where the personal data is necessary for law enforcement or in connection with claims

Opposition: The Holder has the right to object to the processing of his/her personal data when any of the following conditions are met:

- Fundamental rights and freedoms of third parties are not affected, the law permits it and it does not concern public information, of public interest or whose processing is mandated by law.
- The processing of personal data is for direct marketing purposes; the data subject shall have the right to object at any time to the processing of personal

data concerning him/her, including profiling; in which case the personal data shall no longer be processed for such purposes.

- When their consent to the processing is not necessary as a result of the concurrence of a legitimate interest, provided for in Article 7 of the Organic Law on Personal Data Protection, and is justified in a specific personal situation of the Holder, provided that a law does not provide otherwise.

There are certain exceptions where we may refuse a request to object, for example, where the personal data is necessary to comply with the law or in connection with claims.

Portability: The Holder has the right to request his/her personal data in a compatible, updated, structured, common, interoperable and machine-readable format, preserving characteristics; or to transmit them to other data controllers. For the right to data portability to apply, at least one of the following conditions must be met:

1. That the Holder has given consent for the processing of his/her personal data for one or more specific purposes. The transfer or communication will be made between controllers when the operation is technically possible; otherwise the data must be transmitted directly to the owner.
2. That the processing is carried out by automated means.
3. That a relevant volume of personal data is involved.
4. That the processing is necessary for the fulfillment of obligations and the exercise of rights of the controller or processor of personal data, or the holder in the field of labor law and social security.

The right not to be subject to a decision based solely or in part on automated assessments:

The Holder has the right not to be subjected to a decision based solely or partially on assessments that are the product of automated processes, including profiling, that produce legal effects in which their fundamental rights and freedoms are violated, for which they may request the American School of Quito Foundation:

1. A reasoned explanation of the decision made.
2. Submit comments.
3. Request the evaluation criteria on the automated program.
4. Request information on the types of data used and the source from which the data was obtained.
5. Challenge the decision before the American School of Quito Foundation

This right does not apply when:

1. The decision is necessary for the conclusion or execution of a contract between the Holder and the American School of Quito Foundation or its managers.

2. It is authorized by the applicable regulations, court order, resolution or reasoned mandate of a competent technical authority.
3. It is based on the explicit consent of the holder.
4. The decision does not entail serious impacts or verifiable risks for the Holder.

Revocation: You can request at any time the management of your preferences or that we stop processing your personal data.

12. PROCESS TO ENFORCE THE HOLDER'S RIGHTS

To enforce rights, update information or manage consents or preferences including the revocation of consent, American School of Quito Foundation provides a digital channel, accessible through the following email addresses:

Primary National: primaria_nacional@fcaq.k12.ec

Primary International: primary_international@fcaq.k12.ec

Secondary National: secundaria_nacional@fcaq.k12.ec

Secondary International: secundaria_internacional@fcaq.k12.ec

Human Resources: rrhh@fcaq.k12.ec

Suppliers: gerencia@fcaq.k12.ec

Applicant Families and Alumni: admisiones@fcaq.k12.ec

In certain cases, the requested documentation must be attached, in addition to the documentation required for identity verification.

13. CONSEQUENCE OF PROVIDING OR REFUSING TO PROVIDE DATA

For the development of the purposes determined in this document and for our proper operation, it is essential to collect, store, use and communication of personal data. In case there is a refusal or opposition to the treatment of these, the Holder may not access our services properly, or contact and generally comply with several of the purposes described in this Policy.

14. EFFECTS OF PROVIDING INCORRECT OR INACCURATE DATA

The delivery of erroneous, inaccurate or outdated data affects the quality of our services, likewise, in relation to some of the stated purposes may mean that we cannot guarantee its effectiveness.

The Holder must guarantee that the personal data he/she provides is true, accurate, complete and updated and answer for its veracity and updating.

Therefore, the Holder will be responsible for any false, excessive or inaccurate information provided voluntarily and for any direct or indirect, verifiable damages that this may cause. In case of not delivering all the personal data of obligatory filling, the functionality of our services will not be able to be accessed.

For this reason and in order to guarantee the right to obtain the rectification and updating of inaccurate or erroneous data, as well as to complete incomplete data, we provide the following e-mail addresses:

Primary National: primaria_nacional@fcaq.k12.ec

Primary International: primary_international@fcaq.k12.ec

Secondary National: secundaria_nacional@fcaq.k12.ec

Secondary International: secundaria_internacional@fcaq.k12.ec

Human Resources: rrhh@fcaq.k12.ec

Suppliers: gerencia@fcaq.k12.ec

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15. PERSONAL DATA OF THIRD PARTIES

For certain services we are required or requested to process personal data of a third party provided by the Holder, such as contact references. If the data subject provides personal data of third parties, the data subject warrants that he/she has informed them about the purposes for which and the manner in which we need to process their personal data.

16. DIGITAL EDUCATION

As the Foundation is aware that the implementation of personal data protection control measures must be responsible, specialized and proactive, we focus on generating a culture of knowledge for the entire FCAQ Community, which includes students, parents, collaborators, suppliers, authorities, managers and all those involved in the development of processes.

17. FCAQ WEBSITES AND APPLICATIONS

For its operation, American School of Quito Foundation manages the following websites:

- DSIS
- Portal FCAQ*
- HikCentral Professional
- B-School
- OpenApply

- Graduway
- Final Site
- PaperCut
- Factura electrónica
- Google Workspace

*The Foundation will ask the parents or legal representatives to express their will, by signing this document, granting an authorization in favor of the student to use the FCAQ Portal.

18. EXISTENCE OF AUTOMATED DECISIONS THAT PRODUCE LEGAL EFFECTS

The processing of personal data for the purposes indicated in this Policy does not imply the application of automated decisions that produce legal effects for the Holder, unless the Holder has expressly consented to it.

19. FURTHER PROCESSING COMPATIBLE WITH THE INFORMED PURPOSES

If American School of Quito Foundation requires the further processing of personal data for a purpose other than those stated in this Policy, the respective consent will be previously informed and obtained.

In any case, we will only process personal data for further purposes when we have the respective legitimate basis.

20. CHILDREN AND ADOLESCENTS

We collect personal data of children and adolescents for the provision of our services and compliance with legal obligations, its treatment is managed through express consents and the owners and representatives are informed.

Adolescents over 15 years of age may give their consent directly to the Foundation for the processing of their personal data in accordance with the provisions of the LOPDP, but with respect to other legal relationships must be prepared to the provisions of each applicable regulation.

American School of Quito Foundation will ensure the proper use of the data of children and adolescents ensuring respect and compliance with applicable laws and appropriate measures.

21. INTERNAL AUDIT

The observance and compliance with this Personal Data Protection Policy by the different areas of the Foundation shall be subject to review and supervision by the Audit area, which shall be empowered to carry out sample supervisions of the controls established herein whenever it deems it convenient.

22. HOW TO CONTACT US?

In case you need more information about how personal data is handled, we provide our digital channels described in this Policy to contact us.

23. CHANGES TO OUR PERSONAL DATA PROTECTION POLICY

We may modify or amend this Policy from time to time by posting notice on our website at the following link: fcaq.k12.ec.

When changes are made, the revision date will be updated, and such modification or amendment will be effective as of the date of update. For this reason, we suggest that you periodically review this Policy, in order to stay informed about the protection mechanisms implemented.

This Policy consists of this document, as well as the specific conditions of protection of personal data for each of the services, which shall be completed and interpreted in a consistent and systematic manner, respecting, in any case, the will of the owner regarding the general treatment included herein, without affecting the specific conditions of the contracted services.