ACADEMIA COTOPAXI
AMERICAN INTERNATIONAL SCHOOL

Data Protection and Privacy Policy

Approved by: SLT
Date of Approval: May 2026
Review Cycle: 2 years

1. Introduction and Scope

For Asociación Cultural Academia Cotopaxi (hereinafter "Academia Cotopaxi") it is fundamental to protect personal data. We are committed to safeguarding the right to privacy and the ethical processing of personal data.

For the school, handling people's information ethically and respectfully is not only a legal compliance obligation, but also a fundamental component that reflects our values and principles toward our students, parents, collaborators, suppliers, and the community in general.

Our intention is to safeguard individuals' right to privacy, guaranteeing the ethical, responsible, and lawful treatment of personal information. Likewise, we also protect the confidentiality, integrity, and availability of such information.

In accordance with our principles and based on current legislation on privacy and personal data protection, we establish the following General Personal Data Protection Policy, which applies to students, parents/legal guardians, collaborators, candidates, suppliers, and visitors, in strict compliance with the Organic Law on Personal Data Protection (LOPDP) and its associated regulations, and which establishes guidelines to be followed in each of the activities carried out and related to the services we provide.

2. Identification of the Data Controller and Data Protection Officer (DPO)

Data Controller: Asociación Cultural Academia Cotopaxi
Address: De Las Higuerillas E16-102 y Alondras, Quito, Ecuador
Data Protection Officer (DPO): Juan Carlos López Molina

Privacy contact:
dataprotection@cotopaxi.k12.ec
dpd@cotopaxi.k12.ec

3. Processing Principles

Asociación Cultural Academia Cotopaxi processes personal data based on and in compliance with the following principles:

Legality: Personal data is processed in strict adherence to the principles, rights, and obligations established in the Constitution, international instruments, the Organic Law on Personal Data Protection, its regulations, and other applicable rules and jurisprudence.

Fairness: Personal data is processed fairly. Under no circumstances will it be processed through unlawful or unfair means or for unlawful purposes.

Transparency: Personal data is processed transparently through easily accessible communications and always in compliance with current legislation.

Purpose: The purposes of data processing will be transparently communicated to the data subject.

Relevance and data minimization: Only relevant personal data strictly necessary to fulfill the purpose of processing will be handled.

Proportionality: Personal data will be processed appropriately, necessarily, timely, relevantly, and not excessively in relation to the purposes for which it was collected.

Quality and accuracy: Data subjects will be provided with means to ensure their personal data is accurate, complete, verifiable, clear, and, when applicable, duly updated.

Asociación Cultural Academia Cotopaxi reserves the right to continue its relationship with data subjects if the data provided is false, erroneous, or inaccurate.

Asociación Cultural Academia Cotopaxi shall not be responsible for consequences arising from processing false, inaccurate, or erroneous data provided by the data subject.

Confidentiality: Personal data will be processed under strict confidentiality.

Retention: Personal data will be retained only as long as necessary to fulfill the purpose of processing in accordance with applicable legislation.

Data security: Appropriate and necessary security measures will be implemented to protect personal data against risks, threats, and vulnerabilities.

Accountability: Risks related to data privacy will be assessed, and controls will be implemented to protect personal data in compliance with applicable legislation.

4. Sources and Means of Data Collection

Data is collected directly from the data subject (forms, contracts, website), data generated through contractual relationships, and information from authorized third parties.

Sources include: physical and digital forms, website, payment systems, emails, calls, WhatsApp, CCTV surveillance cameras, biometric access systems, among others.

- Physical and digital forms available on our official website: https://www.cotopaxi.k12.ec
- Logs or records
- Calls
- WhatsApp
- Surveillance cameras
- Biometric access systems

Others enabled for Academia Cotopaxi's operations (i.e On-track)**5. Collection and Processing of Personal Data**

Academia Cotopaxi, its collaborators, teachers, and administrative staff collect and process personal data delivered by data subjects, considering the following guidelines:

- In all cases, the purposes for which personal data is collected and processed will be communicated, and explicit consent will be obtained from the data subject or their legal representative when applicable (e.g., minors or persons with disabilities under applicable legislation).
- Consent may be revoked by the data subject and may apply to all initially consented purposes or only to specific ones.
- Processing will respond to legitimate needs of Academia Cotopaxi, aligned with applicable regulations, always guaranteeing privacy rights and the protection of vital interests such as life, integrity, or health.
- Processing includes the application of controls ensuring confidentiality, integrity, and availability of information.

Processing provisions:
Personnel must verify compliance with security standards and proper consent, and must follow these provisions:

Truthfulness: Any applicant, parent, collaborator, or supplier providing false information will be permanently excluded. Academia Cotopaxi reserves the right to take legal action.

Minimization and Authorization: Only necessary data will be collected with prior, explicit, and informed consent, except where the law allows otherwise.

Clarity of Purpose: Data subjects or their representatives must clearly understand the purposes. Authorization will include purpose and be formalized via contracts, privacy notices, informed consent, etc.

Sensitive Data:
Authorization for sensitive data processing must be explicitly given. Academia Cotopaxi guarantees confidentiality and security.

Sensitive Data includes:

- Judicial records, migration status, biometric data
- Health data (protected under medical confidentiality)
- Financial/credit data
- Data of minors
- Data of persons with disabilities

The collected data will be stored and/or processed in the institution's databases, whether owned by the institution or contracted with third parties and/or providers, located within or outside the country, provided that they meet safe harbor standards and guarantee all necessary information security measures. These databases may be available in physical and/or digital form, either directly at ACADEMIA COTOPAXI's offices and/or at the facilities of third parties and/or providers of ACADEMIA COTOPAXI. The storage of personal data, including special category data, will be duly authorized by the data subjects.

Such databases may be identified according to their use through the Technology Department, whose contact channel for handling requests is: itservices@cotopaxi.k12.ec.

6. Data Subjects, Categories, Purposes, and Legal Basis

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Students and Parents or Guardians

Data collected

- Identification data
- Contact and/or location data
- Online geolocation data (use of school transportation)
- Academic performance data
- Disciplinary process data
- Physical health data
- Health, emotional well-being, and special learning conditions data
- Psychopedagogical information
- Biometric and image data (facial recognition)
- Alumni (graduates) information

Purposes of processing

- Academic management
- Administrative, financial, and legal management
- Health, student well-being, and psychopedagogical support
- Institutional communication
- Educational community security
- Use of educational technology platforms

Legal basis

- Consent of the data subject or legal representative
- Compliance with a court order
- Protection of the data subject's vital interests
- Reporting to regulatory authorities

Candidates and Collaborators

Data collected

- Identification data
- Contact and location data
- Background data (criminal, judicial, or other)
- Academic and professional experience data
- Health and medical condition data
- Biometric data
- Occupational medical information
- Multimedia data (audio, video, and images)

Purposes

- Recruitment and hiring processes
- Compliance with labor obligations (IESS, SRI, SSO)
- Payroll processing
- Planning and development of evaluations and reviews of learning practices

Legal basis

- Consent of the data subject
- Execution of pre-contractual and contractual measures

Suppliers

Data collected

- Contact and location data
- Financial data
- Entry/attendance records

Purposes

- Communication for the delivery and supervision of contracted services
- Payment management
- Monitoring within Academy facilities (security)

Legal basis

- Consent of the data subject
- Execution of pre-contractual and contractual measures

Visitors (general)

Data collected

- Identification data

Purposes

- Visitor registration
- Multimedia data (audio, video, and images)

Legal basis

- Monitoring within Academy facilities (security)

Website users

Data collected

- Identification data
- Contact data

Purposes

- Communication to provide information

Legal basis

- Consent of the data subject

7. Purposes of Processing

- Academia Cotopaxi processes personal data for the purposes defined in the Privacy Notices provided to Data Subjects.
- The information collected will be processed solely for educational and administrative purposes, which will be detailed in the consents that each Data Subject signs when providing such information. In the event of any change in the collected information, such change must be reported for its update.
- Additional purposes beyond those described in the established privacy notices may be identified; in such cases, the data subject's consent will be obtained through a privacy notice informing them of the new purposes.

8. Responsibility for CCTV and Security Systems

Academia Cotopaxi uses video surveillance systems based on "legitimate interest" to ensure the security of the community and the school installations, and in compliance with national regulations.

9. Consequences of Not Providing Data

The provision of the requested data is required; refusal to provide it will hinder the school ability to formalize the corresponding educational, employment, or commercial relationship.

10. Retention, Anonymization, and Deletion

Data will be retained for as long as necessary to fulfill the purpose for which it was collected or for the periods required by law (e.g., academic or employment records).

Once this period has ended, Academia Cotopaxi will apply secure deletion mechanisms or strong anonymization (encryption/masking).

11. Data Transfers and Communications

- To fulfill the purposes communicated and consented to by the Data Subject, Personal Data will only be entrusted to third parties for processing when necessary.
- Such entrustment will be carried out through the transfer of personal data or by granting access to the repositories where it is stored, maintaining security measures and controls appropriate to such personal data, and only if the explicit consent of the Data Subject has been previously obtained (except in cases provided for by applicable legislation), and after evaluating the data processor and signing a data processing agreement with the third party.
- The data processing agreement will define the guidelines, roles, and responsibilities established by the data controller that the data processor must comply with, including the purposes for which the entrusted personal data must be processed, the security measures or controls to be implemented, among other conditions.
- In the case of international educational platforms, it will be verified that their security levels are consistent with the type of information to be processed by the third party.
- During the relationship with the third party entrusted with personal data, the Academy will supervise that such parties, acting as Data Processors, protect personal data and comply with applicable legislation through evaluations or, where appropriate, the planning and execution of audits of their practices or services that impact the processing of the entrusted personal data.

Academia Cotopaxi may share personal data with third parties when necessary to fulfill the purposes of processing, including:

- Educational platform providers
- Insurance companies
- Government authorities
- Technology providers

In such cases, data processing agreements will be executed.

12. International Transfers

- If necessary, and in order to fulfill the operations of the Asociación Cultural Academia Cotopaxi and the provision of educational services, Personal Data may be transferred internationally to educational applications, providers, organizations, etc., located outside Ecuador, which will provide adequate levels of protection under their own policies.
- Likewise, among the data processors contracted by the Asociación Cultural Academia Cotopaxi, there may be providers located outside Ecuador, resulting in an international transfer of data as described above. For this purpose, the Asociación Cultural Academia Cotopaxi will only transfer data to third countries (i) by applying appropriate safeguards in accordance with data protection regulations; or (ii) where applicable, if it falls under one of the exceptions established in the Data Protection Law.

13. Data Subject Rights

The data subject may exercise the following rights in accordance with applicable legislation:

Right to information: To be informed, in accordance with the principles of fairness and transparency, about the purposes of processing, legal basis, type of processing, retention period, existence of a database containing their personal data, the origin of the data (when not obtained directly from the data subject), identity and contact details of the data controller, identity and contact details of the Data Protection Officer (DPO), transfers or communications to national or international third parties, among others defined by applicable legislation.

Right of access: To know and obtain, free of charge, access to all their personal data and the information described above, without the need to provide justification, through reasonable means and within the timeframes established by law.

Right to rectification and update: To request the rectification and/or update of personal data identified as inaccurate or incomplete, upon providing evidence supporting such request.

Right to delete: To request the deletion of personal data when any of the following conditions are met: the processing does not comply with applicable data protection principles, is not necessary or relevant for the intended purpose, the data has fulfilled its purpose, the retention period has expired, the processing affects fundamental rights or freedoms, consent is withdrawn, or consent was not granted for one or more specific purposes.

Right to object: To object to or refuse the processing of personal data when it does not affect fundamental rights and freedoms of third parties, does not involve public or public-interest information, or is related to direct marketing such as profiling.

Right to portability: To request and receive personal data in a compatible, updated, structured, commonly used, and interoperable format, preserving its characteristics. The data subject may also request that the data controller transfer the data to another controller where feasible, without undue delay or obstruction.

Right to restriction of processing: To request the suspension of processing when such processing is unlawful.

Right not to be subject to automated decisions: Data subjects will not be subject to decisions based solely or partially on automated processing that produce legal effects or significantly affect their rights or freedoms.

Right to consultation: To publicly and freely consult the National Registry of Personal Data Protection, in accordance with the law.

Right to digital education: To access knowledge, training, and instruction related to the safe and responsible use of information and communication technologies, and their impact on human dignity, fundamental rights, and individual freedoms, especially regarding privacy, identity, and online reputation.

The data subject or their legal representative must submit a request to the contacts listed in the section “Identification of the Controller and Data Protection Officer (DPO)” of this document, attaching a copy of their identification, a clear description of the data, and the right they wish to exercise. The Academy will respond within a maximum period of fifteen (15) days.

Complaint to the Authority: If the data subject considers that their rights have not been properly addressed, they have the right to file a complaint with the Superintendence of Personal Data Protection.

14. Information Security

Academia Cotopaxi maintains a Personal Data Protection and Privacy Management System and has implemented organizational, technological (encryption, security profiles, backups), and human resources controls, among others, to ensure the protection of the information provided and the right to privacy.

Additionally, the Institution and its employees have agreed to maintain confidentiality regarding Personal Data and not to disclose any Personal Data to unauthorized third parties (both within and outside ACADEMIA COTOPAXI). Personal data processing will include controls that ensure confidentiality, integrity, and availability of information in accordance with its impact on individuals’ rights and freedoms.

15. Policy Modifications

This policy may be updated in response to regulatory changes. Substantial changes will be communicated through official channels.