

# APPENDIX 1 – PRIVACY NOTICE FOR STUDENTS AND LEGAL REPRESENTATIVES

(Cross-reference to Section 14 of Genuine School's Privacy and Personal Data Processing Policy – Version 2)

In accordance with the principle of differentiated transparency (Art. 5.1(a) of the European Union's General Data Protection Regulation – GDPR; Art. 8 of Colombia's Law 1581 of 2012; and Arts. 6 and 9 of Brazil's General Data Protection Law – LGPD), this Notice is intended to provide clear, precise, and context-specific information regarding the processing of personal data of minor students and their legal guardians.

This document serves as an explanatory and operational supplement to Genuine School's Privacy and Personal Data Processing Policy. It does not modify or replace the Policy; rather, it provides specific detail on the provisions applicable to this category of data subjects.

This Notice is addressed to:

- Students currently enrolled at Genuine School.
- Applicants in the admissions process.
- The parents or legal guardians responsible for these students.

## 1. Reaching the Age of Majority and Transition of Consent

When a student attains the legal age of majority (18 years), the processing of their personal data will require their direct, express, and informed consent from that point forward. Consent from parents, guardians, or legal representatives will no longer be necessary. Accordingly, the student will assume full control over their personal data rights and may exercise them independently.

## 2. Specific Purpose of Processing

The personal data of students and their legal representatives is collected, stored, and processed by Genuine School to ensure the fulfillment of its educational, administrative, and comprehensive support mission. In particular, the specific purposes are:

- To manage the admission, validation, and enrollment processes for national and international students, from application through formal registration.
- To develop personalized educational programs, including assessments, leveling, feedback, and pedagogical monitoring, in order to meet individual academic needs.
- To record and document well-being activities, academic guidance, and support for students with special needs, ensuring comprehensive assistance that promotes their physical, emotional, and social development.
- To manage access to and use of educational platforms and digital tracking systems, ensuring the safe and efficient operation of virtual learning environments.
- To issue, validate, and safeguard certificates, transcripts, and academic degrees, in accordance with applicable national and international educational regulations and institutional standards of authenticity and traceability.
- To capture, record, and disseminate images, voice recordings, or student-created materials for educational, institutional, and, in some cases, promotional purposes, always with the free, prior, and informed consent of the legal representative—or of the student themselves once they reach the age of majority.

These purposes are aligned with Section 6.2.a of the General Policy and are based on the following legal provisions:

- Articles 6.1.b and 6.1.e of the General Data Protection Regulation (GDPR – EU), relating to the performance of an educational contract and the fulfillment of a task carried out in the public interest.
- Article 5 of Law 1581 of 2012 (Colombia), which establishes the lawfulness, purpose, and proportionality of data processing.
- Article 7 of the Brazilian General Data Protection Law (LGPD – Brazil), which regulates the legal bases for processing, including contract performance and the regular exercise of rights.

For students under the age of 18, processing is always carried out under the principle of the best interests of the child and based on verifiable consent provided by their parents or legal guardians. When a student reaches the age of majority (18 years), consent must be given directly, expressly, and informed, without the need for intervention from their legal representatives, who cease to act as grantors.

Purposes related to the use of images, voice recordings, participation in public events, or institutional advertisement are optional and require specific, free, and informed parental consent, granted independently of academic enrollment. Refusal to grant such authorizations does not affect the student's access to educational services, nor does it incur academic or disciplinary consequences.

### **3. Types of Data Processed**

In compliance with the principle of data minimization (Art. 5.1.c of the General Data Protection Regulation – GDPR), Genuine School processes only the personal data that is strictly necessary, relevant, and proportionate for the purposes outlined above. These include, but are not limited to:

- Identification and contact information of the student and their parents or legal guardians.
- Academic information, such as academic record, grades, class participation, assessments, and feedback.
- Health records and psycho-pedagogical monitoring, when necessary to ensure the student's proper care and overall well-being.
- Digital traceability data from institutional platforms, including access logs, academic interactions, and use of online educational resources.
- Records derived from the admissions and educational guidance process, including communications, interviews, informational sessions, or demonstration classes, as well as institutional notes related to the student's academic and administrative support.

For a more comprehensive and categorized description of the types of data processed by the institution, please refer to section 6.1 of Genuine School's Privacy and Personal Data Processing Policy.

## 4. Verifiable Parental Consent and Enhanced Protection

The processing of personal data of minor students is carried out under the principle of the best interests of the child, in accordance with Article 8 of the General Data Protection Regulation (GDPR), the Children's Online Privacy Protection Act (COPPA – Sections 1302 and 1303, USA), Article 7 of Law 1581 of 2012 (Colombia), and Article 14 of the LGPD (Brazil).

For any processing of personal data that does not arise from a legal or contractual obligation, Genuine School requires that consent be provided exclusively by the minor's legal representative, through verifiable, traceable, and auditable mechanisms that ensure its legal validity and the enhanced protection of the student's rights.

In accordance with Section 7 of the Privacy and Personal Data Processing Policy, such consent is obtained through:

- Institutional digital forms containing specific authorization clauses and identity verification controls.
- Academic contracts that include provisions authorizing the processing of student data.
- Previously registered and authenticated electronic channels (institutional emails, educational platforms, and certified electronic signature systems).

All these mechanisms are supported by appropriate technical and legal safeguards, ensuring the traceability, integrity, and validity of the authorizations, in compliance with the principle of accountability (Art. 5.2 GDPR).

## 5. International Data Transfers

Personal data processed by Genuine School may be subject to international transfers to processors located primarily in the United States, including strategic technology providers such as Microsoft, Amazon, and Meta, among others, in accordance with Section 11 of the General Privacy and Personal Data Processing Policy.

These operations are carried out under conditions of legality, proportionality, and security, and are safeguarded by:

- Standard Contractual Clauses of the European Commission (Art. 46 GDPR), ensuring an adequate level of protection for transfers outside the European Economic Area.
- Data Processing Agreements (DPAs) executed with each provider, including specific commitments regarding confidentiality, security, and purpose limitation.
- Protection mechanisms equivalent to those required by the GDPR (EU), the LGPD (Brazil), and Law 1581 of 2012 (Colombia), including enhanced technical and organizational measures to safeguard the confidentiality, integrity, and availability of information.

In this manner, Genuine School ensures that all international transfers or transmissions of personal data are carried out only with providers that offer adequate safeguards and in strict compliance with international data protection standards.

## **6. Data Subject Rights and Procedures**

Legal representatives of minor students, as well as the students themselves upon reaching the age of majority, may exercise their rights of access, rectification, erasure, objection, restriction of processing, data portability, and withdrawal of consent at any time, in accordance with:

- Articles 15 to 21 of the General Data Protection Regulation (GDPR – European Union).
- Article 8 of Law 1581 of 2012 (Colombia) and its implementing Decree 1377 of 2013.
- Articles 17 to 20 of the Brazilian Data Protection Law (LGPD – Brazil).

Requests should be addressed to the Data Protection Officer (DPO) through our official communication channel: [legal@genuinelab.us](mailto:legal@genuinelab.us).

In accordance with Section 9.4 of the General Policy, response times will be aligned with the applicable regulations based on the data subject's country of origin. Therefore:

- Under the GDPR (European Union), the institution will respond within 30 calendar days of receiving the request (Art. 12.3 GDPR).
- In Colombia, the response period is 15 business days, in accordance with Decree 1377 of 2013.

- In Brazil, the deadlines established by the LGPD will be observed, ensuring a prompt and traceable response.

All procedures will be carried out free of charge for the data subject, except where certified physical copies are requested, in which case only the cost of producing physical copies will be charged.

## **7. Update and Traceability**

This Notice was approved and published simultaneously with Version 2 of the Personal Data Processing Policy. Any changes will be recorded in accordance with the institutional version control system and communicated through official channels.