

APPENDIX 2 – PRIVACY NOTICE FOR CONTRACTORS, SUPPLIERS, TEACHERS, AND STRATEGIC PARTNERS

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

This Privacy Notice is addressed to all natural or legal persons who, in their capacity as contractors, contracted teachers, tutors, advisors, consultants, technology providers, strategic partners, or other third parties, maintain a contractual or service provision relationship with Genuine School.

Its purpose is to ensure transparency in the processing of personal data associated with such relationships, in accordance with the principles of prior information, shared responsibility, and confidentiality (Articles 13 and 28 of the GDPR; Articles 8 and 4 of Law 1581; Articles 6 and 39 of the LGPD). This Notice shall complement and form an integral part of the Privacy and Personal Data Processing Policy.

This document shall complement and form an integral part of Genuine School's Privacy and Personal Data Processing Policy, without replacing or amending it.

1. Purposes of Processing

The personal data of contractors, suppliers, and strategic partners shall be processed for the following purposes:

- To formalize, execute, and manage service agreements, service orders, or purchase orders.
- To verify background, professional suitability, experience, and the technical or regulatory requirements inherent to the nature of the services.
- To manage payments, invoicing, tax obligations, and financial records related to the contractual relationship.

- To assign, control, and monitor access to Genuine School's educational, administrative, or technological platforms.
- To ensure the traceability of activities carried out within the scope of the contracted services.
- To comply with internal and external audits, as well as with requirements from competent authorities.
- To ensure information security and the operational continuity of the educational model.

These purposes shall be based on Articles 6(1)(b) and 6(1)(c) of the GDPR, Article 5 of Law 1581 of 2012, and Article 7, items II, V, and VI of the LGPD, as well as Section 6.2(b) of the General Policy.

2. Categories of Data Processed

Depending on the nature of the contractual relationship, Genuine School may process the following categories of personal data:

- Identification and contact data: Full name, identification document, tax identification numbers (e.g., RUT/NIT), employer identification number (EIN), email address, phone number.
- Contractual and financial data: Contractual terms, fees, invoicing data, tax, and banking certifications.
- Professional data: Curriculum vitae, professional experience, references, certifications, and professional licenses.
- Digital and technological records: Platform access data, credentials, activity logs, institutional communications.
- Judicial or disciplinary records, solely where strictly necessary in light of the nature of the services (e.g., access to information relating to minors).

The personal data processed shall be internally classified as Level 2 (Confidential) or Level 3 (Restricted), in accordance with Section 6.4 of the General Policy and the Information Security Management System (ISMS).

3. Data Processing and Joint Responsibility

When contractors, suppliers, or partners are granted access to personal data of students, parents, legal representatives, or other third parties, they shall act as **data processors**, in accordance with Article 28 of the GDPR, Article 3(g) of Law 1581 of 2012, and Article 39 of the LGPD.

In this capacity, they shall:

- Process personal data solely in accordance with Genuine School's documented instructions.
- Ensure the confidentiality, integrity, and availability of the information.
- Implement technical and organizational measures appropriate to the level of risk.
- Cooperate in audits, investigations, incident management, and in the handling of data subject rights requests.
- Notify Genuine School without undue delay of any personal data breach or security incident of which they become aware.
- Delete or return personal data upon termination of the contractual relationship, unless retention is required by law.

4. International Data Transfers

When the provision of services involves international transfers of, or access to, personal data (e.g., use of cloud services, technology outsourcing, or remote access), Genuine School shall require:

- The execution of standard contractual clauses or other transfer mechanisms recognized under Article 46 of the GDPR.
- Compliance with Article 33 of Law 1581 of 2012 (Colombia) and Articles 33 to 36 of the LGPD (Brazil).
- The implementation of safeguards ensuring an adequate level of protection in the destination country, including contractual, technical, and organizational measures equivalent to those required under applicable data protection laws.

5. Data Subject Rights and Contact Channel

Data subjects may exercise their rights of access, rectification, erasure, objection, restriction of processing, data portability, and withdrawal of consent, in accordance with applicable regulations, by submitting a request to the Data Protection Officer (DPO) through the following institutional channel:

- legal@genuinelab.us

Response times shall be those established in Section 9.4 of the General Policy.

6. Validity and Updates

This Notice shall enter into force together with Version 2 of Genuine School's Privacy and Personal Data Processing Policy and shall be reviewed periodically, or whenever contractual processes, applicable regulations, or the platforms used are modified.