

APPENDIX 3 – PRIVACY NOTICE FOR CANDIDATES IN THE SELECTION PROCESS

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

In compliance with Article 13 of the General Data Protection Regulation (GDPR – European Union), Article 8 of Law 1581 of 2012 (Colombia), and Article 6 of the Brazilian Data Protection Law (LGPD – Brazil), Genuine School informs all individuals participating in selection processes—whether for teaching or administrative positions, internships, or professional service engagements—about the specific processing of their personal data.

This Notice aims to uphold the principle of transparency and the duty to provide prior information, detailing the most relevant aspects of the processing of personal data throughout all stages of the selection process, including applications, resume submissions, profile assessments, interviews, aptitude tests, verifications, and validations, as well as the final decision regarding contractual engagement.

This document complements Genuine School's Privacy and Personal Data Processing Policy and is applied in a subsidiary and consistent manner, without modifying its scope or replacing its provisions.

Purposes of Processing

During the selection process, Genuine School will process candidates' personal data in a legitimate, necessary, and proportionate manner to ensure the proper management of recruitment and contractual decisions. Specifically, the purposes include:

- Receiving, analyzing, and classifying resumes, application forms, and supporting documents submitted by applicants.
- Conducting interviews, aptitude tests, psychometric evaluations, employment reference checks, and reviewing academic, professional, or disciplinary records, as applicable.
- Contacting applicants through authorized institutional channels to communicate progress, results, or process requirements.

- Documenting and maintaining records of the selection process for traceability, regulatory compliance, auditing, and addressing any potential administrative or legal claims.
- Deciding on potential employment contracts, considering competencies, qualifications, and institutional requirements.

These purposes are consistent with the provisions of section 6.2.b of Genuine School's Privacy and Personal Data Processing Policy and are based on Articles 6.1.b and 6.1.f of the GDPR (EU), Article 5 of Law 1581 of 2012 (Colombia), and Article 7 of the LGPD (Brazil).

If a candidate is selected and a contractual relationship for the provision of services is formalized, the processing of their personal data will thereafter be governed by the Privacy Notice applicable to contractors, suppliers, and strategic partners, without prejudice to retaining selection process information in accordance with applicable legal deadlines.

Types of Data Collected

As part of the selection process, Genuine School may collect and process the personal data necessary to evaluate a candidate's suitability and skills, in line with the principle of data minimization (Art. 5.1.c GDPR).

This data includes, among others:

- Identification and contact information: Full name, ID, email address, residential address, and phone numbers.
- Academic and professional background: Resumes, academic degrees, certifications, accreditations, work history, and experience relevant to the position.
- Assessment results: Interviews and psychometric, technical, pedagogical, or aptitude tests conducted as part of the selection process.
- Sensitive or specially verified information, such as criminal or disciplinary records, or occupational medical results, collected only when the nature of the position requires it e.g., teaching roles involving minors or fiduciary responsibilities).
- Verifiable professional and personal references, obtained through legitimate and traceable mechanisms.

The processing of this data will be carried out under strict confidentiality, security, and purpose limitation measures, in accordance with the institutional controls established in Genuine School's Privacy and Personal Data Processing Policy.

Legal Basis for Processing

The processing of candidates' personal data in selection processes is based on clear and distinct legal grounds, in accordance with international and local data protection regulations:

- Pre-contractual measures requested by the candidate are necessary for managing their application and the potential formalization of an employment or service contract. (*Art. 6.1.b GDPR – EU / Art. 5 Law 1581 of 2012 – Colombia / Art. 7, V LGPD – Brazil*).
- The legitimate institutional interest of Genuine School enables a transparent, rigorous, traceable, and well-documented selection process, provided that the fundamental rights and freedoms of the data subject are respected. (*Art. 6.1.f of the GDPR – EU / Art. 10 of the LGPD – Brazil*).
- The candidate's free, informed, and explicit consent is required when processing sensitive data (such as medical information, criminal records, or biometric data), in accordance with Article 9.2.a GDPR, Article 7 Law 1581 of 2012 (Colombia), and Article 11 LGPD (Brazil).

In this way, Genuine School ensures that all processing of personal data within the scope of selection processes is carried out under a valid, legitimate, and documented legal basis, as established in section 7 of our General Policy.

Retention and Deletion

The personal data collected within the scope of the selection process will be stored for the time necessary to fulfill the purposes previously communicated.

If the hiring process does not result in employment, the data will be securely and permanently deleted once the retention periods defined by Genuine School in its General Policy have elapsed. These retention periods vary depending on the applicable jurisdiction and the nature of the selection process.

Exceptionally, and with the prior, free, explicit, and informed consent of the data subject, the data may be retained in the institution's human resources database for consideration in future job openings or selection processes.

In all cases, the retention and eventual deletion of personal data will be carried out using technical, organizational, and legal measures that guarantee the confidentiality, integrity, and security of the data being processed.

Recipients and International Transfers

Within the scope of the selection processes, candidates' personal data may be shared, in a limited manner and under conditions of confidentiality, security, and legitimate purpose, with the following recipients:

- Data processors who support the selection stages, including the administration of technical, psychometric, or aptitude tests, provided that a contractual agreement guarantees confidentiality and compliance with data protection obligations.
- Technology and digital infrastructure providers used by Genuine School for the management of applications, interviews, and secure storage of information.
- Administrative, educational, judicial, or regulatory authorities in cases where there is an express and duly substantiated legal requirement.

When data processing involves international transfers—for example, through the use of technological platforms such as Microsoft Forms, Amazon Web Services, or other cloud solutions—Genuine School ensures that these operations are carried out under appropriate legal and technical safeguards, including:

- The adoption of standard contractual clauses in accordance with Article 46 of the GDPR (European Union).
- Compliance with the obligations established in Article 33 of Law 1581 of 2012 (Colombia).
- The application of protection mechanisms for international transfers as established in Articles 33 to 36 of the LGPD (Brazil).

In this way, Genuine School guarantees that candidates' data has an equivalent and adequate level of protection, in accordance with the most demanding international standards.

Data Subject Rights and Institutional Channel

Candidates may exercise their rights to access, update, rectify, erase, object to, restrict the processing of, transfer, or withdraw consent for their personal data 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)
- Articles 17 to 20 of the Brazilian Data Protection Law – LGPD (Brazil).

Requests must be submitted to the Data Protection Officer (DPO) through the designated institutional channel at legal@genuinelab.us.

The processing of requests will follow the response times and procedures established in the General Policy, which may vary depending on the applicable jurisdiction and the country of origin of the data. In all cases, Genuine School guarantees that data subject requests are handled diligently, transparently, and in a traceable manner.

Validity

This notice was issued as part of Version 2 of the General Privacy Policy and will be updated according to the institutional review cycle or whenever changes occur in the selection processes.