

## **APPENDIX 4 – PRIVACY NOTICE FOR INTERESTED PARTIES, PROSPECTS, AND WEBSITE VISITORS**

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

This notice is addressed to individuals who, while not formally affiliated with Genuine School as students, legal representatives, collaborators, suppliers, or contractors, interact with the institution through web forms, contact emails, virtual events, academic fairs, or promotional channels, and voluntarily provide their personal data in order to receive institutional, academic, or promotional information.

In compliance with the principle of prior information and transparency (Article 13 of the General Data Protection Regulation – GDPR; Article 8 of Law 1581 of 2012 – Colombia; and Article 9 of the General Data Protection Law – LGPD, Brazil), this notice constitutes a complementary extension of Genuine School's Privacy and Personal Data Processing Policy and establishes the specific conditions applicable to this category of data subjects, ensuring that their data is processed lawfully, fairly, proportionately, and securely.

### **Purposes of Processing**

The personal data of interested individuals, prospective students, and website visitors will be processed lawfully, proportionately, and securely, exclusively for the following purposes:

- To respond to requests for academic, institutional, or commercial information.
- To manage the distribution of electronic communications (emails, newsletters, invitations, or informational materials) related to Genuine School's educational offerings.
- To monitor user interest and maintain records of their interactions with the institution.
- To invite and facilitate participation in institutional events, academic fairs, virtual sessions, or educational guidance activities.

- To conduct aggregated (rather than individualized) analyses and basic audience segmentation, without automated decision-making with legal effects, for the purpose of continuously improving services and institutional strategy.

At this preliminary interaction stage, Genuine School will implement proportionate technical and organizational measures to prevent the collection of personal data from minors, ensuring that forms and contact channels are completed by their parents or legal guardians. If the inadvertent collection of data from minors without proper authorization is identified, the institution will proceed with its immediate deletion.

These purposes correspond to Section 6.2.d of the General Privacy Policy and are protected by the following legal bases: the prior, free, informed and verifiable consent of the data subject (Art. 6.1.a of the GDPR; Art. 7 of Law 1581; Art. 7, paragraph I of the LGPD).

## **Personal Data Processed**

Depending on the interaction channel used, Genuine School may collect and process the following personal data:

- Identification and contact information: name, email address, telephone number, and country of residence.
- Academic preferences and level of interest expressed in relation to the institution's educational offerings.
- Technical browsing data: IP address, approximate location, device type, operating system, and browser used.
- Information voluntarily provided through web forms, institutional chats, emails, or other available contact methods.

In accordance with Section 6.4 of our Policy and the institutional ISMS guidelines, this data is classified as Level 2 – Confidential, and its processing is subject to appropriate security, confidentiality, and proportionality controls.

## **Legal Basis and Consent**

The processing of this data is based on the freely given, specific, informed, and verifiable consent of the data subject, in accordance with:

- Article 6.1.a and Article 7 of the GDPR (European Union);
- Article 7 of Law 1581 of 2012 (Colombia);
- Article 8 of the LGPD (Brazil).

When the data subject completes and submits the institutional forms or uses the enabled electronic channels, consent is deemed to be given. This consent may be revoked at any time, without retroactive effect on previously carried out processing, through the official channels provided for in our Policy.

## **Retention Period**

Personal data will be retained only for as long as necessary to fulfill the purposes set out in this notice, or until the data subject withdraws their consent or requests the deletion of their data, whichever occurs first.

As a general rule, the data of interested parties and prospective clients that does not result in an admission or hiring process will be deleted or anonymized after a reasonable period of inactivity, in accordance with internal procedures and applicable regulations.

Genuine School also applies different retention periods depending on the applicable jurisdiction, in accordance with its Policy, and conducts periodic reviews of its prospect databases to ensure the ongoing validity, relevance, and proportionality of the processing carried out.

## **International Transfers and Tools Used**

Institutional forms and other contact channels may be supported by third-party technology platforms located outside the country (for example, Microsoft Forms, customer relationship management systems (CRM), or email marketing tools).

In these cases, Genuine School ensures that it:

- Has data processing and confidentiality agreements in place with the relevant providers;
- Verifies the implementation of Standard Contractual Clauses and equivalent safeguards, in accordance with Article 46 of the GDPR, Article 33 of Law 1581 of 2012 (Colombia), and Articles 33–36 of the LGPD (Brazil);
- Limits the processing of personal data solely and exclusively to the purposes authorized by the data subject, without permitting any other or incompatible use.

## **Data Subject Rights and Contact Mechanism**

Data subjects and prospective clients 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 GDPR (European Union);
- Article 8 of Law 1581 of 2012 (Colombia);
- Articles 17 to 20 of the LGPD (Brazil).

Requests must be submitted to the Data Protection Officer (DPO) through the official channel provided by our institution: [legal@genuinelab.us](mailto:legal@genuinelab.us)

All requests will be handled within the timeframes established by applicable regulations and the Privacy Policy, ensuring a free, transparent, and traceable process for data subjects.

## **Validity and Version Control**

This notice complements the Privacy Policy (Version 2) and will be updated in accordance with institutional review cycles or whenever changes are made to contact channels, digital tools, or applicable regulations.