



PERSONAL DATA PROCESSING POLICY FOR FOUNDATION FOR THE ASSISTANCE OF ABANDONED CHILDREN-FANA

- I. **FANA**, an entity responsible for providing services of social interest that may be implemented individually or in coordination with official agencies or domestic or international individuals engaged in adoption programs, protection, assistance or shelter for children, as well as education, health, development and maternal and child welfare, in the development of their non-profit activities, collects , stores and uses personal information of its customers, employees, suppliers, and persons who may be able to have a contractual or legal relationship with the company.
 - II. **FANA** is aware of the implications of the treatment of personal data, and therefore carries out such activity in accordance with the principles and guidelines contained in the Statute for the Protection of Personal Data-Law 1581 of 2012, the decree that regulates and guides the implementation of the principle of responsibility of the Superintendent of Industry and Trade. With the aim to protecting and securing personal data holders due to the treatment of their information, **FANA** issues the present policy of processing personal data in compliance with the relevant regulations and the principles of legality, purpose , freedom, quality, access and restricted circulation, security and confidentiality of the statutory law 1581 of 2012.
- I. **OBJECT.**
 - II. FANA's personal data processing policy seeks to guarantee the right to habeas data for persons who gave their personal data for due treatment (use, collection, suppression, storage and circulation) in accordance with the purpose reported in the given authorization.
 - III. II. Identification of the person responsible for the processing of personal data
 - IV. FANA, as responsible for the processing of personal data, is an entity constituted by public deed No. 245 of the notarial number 13 of Bogota D.C., from the 4th of February of 1991, registered on June 26, 1991 under the number 330,610 of the book IX, company identified with NIT. 800.133.562-0 and commercial registration 00459,132 of June 26th of the year 2001. FANA, has designated within its structure a personal data protection officer according to the provision of the guide for the implementation of the principle of responsibility demonstrated by the Superintendent of Industry and Trade. The personal Data Protection officer assumes the function of protecting personal data within the company, in compliance with the rules governing the matter, as well as the policies established for that purpose within FANA.
 - V. Scope of the Information Processing Policy
 - VI. According to law 1581 of 2012, it is understood by personal data holders, the "natural person whose personal data is subject to treatment", therefore the policy of FANA, focuses on personal data from natural persons.
 - VII. Coverage of these policies covers all employees, customers, suppliers of FANA, as well as potential customers with whom the foundation maintains communication.



- VIII.** Within the foundation there is no treatment (collection, storage, use, circulation or suppression) of sensitive data (understanding sensitive data such as those that affect the privacy of the proprietor or whose misuse can generate discrimination such as ; racial or ethnic origin, political affiliation and religious beliefs, among others).
- IX.** Personal data susceptible to the treatment. FANA treats the personal data listed below according to the database and according to the purposes set out in the following table:

| FANA | PERSONAL DATA | PURPOSE |
|--------------------|---|---|
| Third Parties | Name, last name, email, address and country of residence, cell phone number, landline telephone number, on occasions when it is an adopted child or adoptive family | Convene events, send newsletters, solicit business alliances and donation plans |
| Employees | Name, cedula (identification number), place of dispatch, address, cell phone number, email, date of birth, photo, RH, gender, marital status, number of children, names of children, emergency contact, emergency contact phone number, labor certification, personal certification, EPS, AFP, caja, ARL, | Verify the information of the employees and contractors of Fana |
| Suppliers | Name, Cédula, NIT (identification number), address, phone number, tax regime. | To check and control the payment to suppliers and the payment of taxes |
| Adoptive Families | Names, identification, address, phone number, email, date and place of dispatch, birth dates, ages, marital status, photos, gender, income, previous disciplinary issues,, previous health issues | To consult information about adopting families with the child assigned or in the process of adoption. |
| Preschool Children | Name, Identification document (NUIP, identity card, cedula), address, phone number, date and place of dispatch from C.C, date of birth, age, marital status, photo, gender, blood type. Other identification documents. | Consultation of information and control of the number of children attending the preschool |
| Preschool Families | Name, identification document (NUIP, identification card, cedula), address, phone number, date and place of dispatch from C.C, date of birth, age, marital status, photo, | Consult and update data. Contact with families |



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| | gender, blood type. Other identification documents. | |
| Children in restoration of rights program | Name, Last name, NUIP, family information, date of birth, illnesses. | Register the entry and exit of the NNA to the foundation and the family linked to the PARD |
| Families in restoration of rights program | Name, last name, cédula of citizen, identificatin number, place of dispatch, family information. | Register the entry and exit of the families linked to the PARD |
| Hogar Margarita-Mothers | Name, last name, cédula, address, phone number, date and place of dispatch from C.C, date of birth, age, marital status, gender, blood type, lab results, psychological history. | Control of entry and exit of users, follow-up to processes. |
| Hogar Margarita-Children | Name, Last name, NUIP, name of parents, EPS, address ,age, phone number, vaccination history, vaccination card if applicable, physical information | Control of the children who enter with their mothers to the program |

IV. RIGHTS OF PERSONAL DATA HOLDERS

FANA, informs the owners of the personal data that the rights they can exercise in accordance with law 1581 of 2012, are as follows: 1. Know, update and rectify your data to those who are responsible for the treatment or in charge of the treatment. This right may be exercised, in the face of partial, inaccurate, incomplete, fractionated, error-inducing data, or those whose treatment is expressly prohibited or has not been authorized. 2. To request proof of the authorization granted to the person in charge of the treatment except when expressly a requirement for the treatment, in accordance with the provisions of article 10 of law 1581 of 2012. 3. To be informed by the person in charge of the treatment, on request, regarding the use of personal data of the holder. 4. To present to the Superintendent of Industry and Trade complaints for infringements of the provisions of this law and the other rules amending it, adding or supplementing it. 5. Revoke the authorization and/or request the deletion of the data if the treatment the principles, rights and constitutional and legal guarantees are not respected. The repeal and/or deletion will proceed when the Superintendent of Industry and Trade has determined that in the treatment, the manager has exhibited conduct contrary to this law and the Constitution. 6. Access to your personal data is done free of charge.

V. AREA RESPONSIBLE FOR THE CARE OF QUERIES AND CLAIMS

At **FANA**, the area responsible for the attention of petitions, queries and claims will be the data protection officer through the following channels of attention to the owner of the personal data:

1. TELEPHONE ATTENTION:



The phone call to the data holder for queries or claims is 57 1 6806000 ext. 207 (Bogotá) between the hours of 8:30 am to 5:00 pm (continuous schedule). The call will be attended by the individual in charge, who shall forward it to the personal Data Protection officer designated within the company.

2. WEB PAGE OR EMAIL

Web page will be attended by the following address: comunicaciones@fundacionfana.org

According to the parameters set forth in the following chapter. VI. Consultation procedure the owners of personal data or their successors may request the consultation of their personal data to the channels described in the previous chapter. E-mail inquiries shall contain at least: (i) the full identification of the holder, (ii) the personal data that they want, (iii) address, (iv) e-mail, and; (v) If it is successors to annex the respective document showing it. The consultation will be attended by **FANA**, within a maximum of ten (10) business days counted from the date of receipt of the e-mail or the physical document. Where it is not possible to attend the consultation within that term, **FANA**, shall inform the person concerned by expressing the reasons for the delay and shall indicate the date on which his application will be served within a maximum of 5 working days following the expiration of the first term. When the consultation is not clear, is not understood, or does not meet the necessary requirements to develop a response by **FANA**, it will inform the holder or the successor to submit the consultation again at the latest within five (5) business days following the request of the consultant. After two (2) months from the date of the request, without the applicant submitting the required information, **FANA** will understand that the holder or successor has waived the consultation.

In the event that the person receiving the claim is not competent to resolve it, it shall transfer to the person who corresponds within a maximum of 2 working days and shall inform the person concerned of the situation.

Thus the maximum term to attend the consultation will be 15 working days, as long as within 10 working days after receipt of the consultation by any means arranged for it is informed to the proprietor the reason for the delay; otherwise the maximum term will be 10 working days.

VII. CLAIM PROCEDURE

When the holder or successor considers that the information contained in our database should be subject to correction, authorization, deletion or revocation of authorization, the individual may file a claim to the attention channels available for that purpose in the previous chapter. This claim shall contain at least: (i) the full identification of the holder, (ii) Description of the facts giving rise to the claim, (iii) address, (iv) e-mail, and; (v) accompanying documents that the holder or successor wants to enforce.

If the claim is incomplete, **FANA** will respond to the interested party within five (5) business days following receipt of the claim to remedy the failures. After two (2) months from the date of the request, without the applicant submitting the required information, **FANA** will understand that the holder or successor have waived



the claim. **FANA** will respond to the claim within a maximum of fifteen (15) business days counted from the day following the date of receipt. Where it is not possible to address the claim within that term, the person concerned shall be informed of the reasons for the delay and the date on which the claim is to be handled without exceeding eight (8) business days following the expiration of the first term. Personal data holders are hereby informed that the deletion or recall of data processing authorization shall not proceed when the holder has a LEGAL or CONTRACTUAL duty to remain in the FANA database.

VIII. TEMPORARY LIMITATIONS TO THE PROCESSING OF PERSONAL DATA

According to decree 1377 of 2013, FANA, may only collect, store, use or circulate the personal data of a person, for as long as it is reasonable and necessary, and in agreement with the purposes that justified the treatment, in accordance with the provisions applicable to the subject matter and to the administrative, accounting, fiscal, legal and historical aspects of the information. Once the finality of the treatment has been fulfilled and without prejudice to legal norms, **FANA** must proceed with the suppression of the personal data in its possession. As an exception to the foregoing, **FANA** may retain personal data when required for the fulfillment of a legal or contractual obligation.

IX. VALIDITY OF THE INFORMATION PROCESSING POLICY

This treatment policy developed by **FANA** begins its validity on the 14th of September 2017.