

# Personal Data Protection Policy

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## Introduction

Ellucian Company LLC (hereinafter, "Ellucian" or the "Company") is committed to the proper management of Personal Data; therefore, it ensures compliance with national and international regulations, as well as with the guidelines issued by oversight and regulatory authorities, in order to guarantee information security, the proper handling of Data Subjects' personal information, and respect for habeas data. In this context, the Company has developed this Personal Data Processing Policy (hereinafter, the "Policy").

## Identification of the Data Controller

Ellucian Company LLC maintains offices in Colombia at Calle 72 No. 5-83, 4th floor, in the city of Bogotá D.C., Colombia.

Email: [privacy@ellucian.com](mailto:privacy@ellucian.com)

## Scope

This Policy shall apply to the Personal Data Processing activities carried out by Ellucian in Colombia in its capacity as Data Controller, directly and through third parties, within the framework of Law 1581 of 2012 and its implementing decrees: Decree 1377 of 2013, Decree 886 of 2014, and Unified Decree 1074 of 2015.

By providing their Personal Data to the Company, the Data Subject declares that they have reviewed this Policy, agreed to be bound by it, and accepted that their Personal Data will be processed in accordance with its terms, pursuant to the consent granted to Ellucian.

This Policy has been designed to regulate the collection, storage, processing, management, and protection of Personal Data obtained from clients, suppliers, users, candidates, employees, and other individuals linked to Ellucian's activities.

The collection of Personal Data shall be carried out through the means authorized by the Company, including, but not limited to, communication channels, physical or digital documents, consent forms, and any other applicable mechanism. Likewise, the Processing of information, whether automated or manual, shall be managed ensuring that Data is stored, used, shared, and/or deleted in accordance with the purposes set forth in this Policy.

This Policy seeks to inform Personal Data Subjects about the purposes for which their Data is processed and the responsibilities assumed by Ellucian in connection with the Processing of

their Personal Data. The Processing of Personal Data managed by third parties, who act as Data Processors, is supervised by Ellucian under strict controls to ensure compliance with legal obligations and defined internal policies. In cases where the management of information must be carried out by third parties on behalf of Ellucian, the Processing shall be conducted in accordance with the purposes described in this Policy and under the information security guidelines defined by the Company, guaranteeing the confidentiality, integrity, and availability of the Data processed.

The Processing of Personal Data by Ellucian is carried out solely for the execution of the activities necessary to achieve the established objectives and in accordance with the purposes set forth in this Policy.

Finally, the Company reaffirms its commitment to the ethical and responsible management of personal information. An organizational culture that ensures regulatory compliance and the adoption of best practices at every stage of the Data lifecycle shall be promoted, protecting both the Company's reputation and the rights of the Data Subjects. Likewise, the guidelines established in the chapter titled "General Terms" of the corporate Personal Data Protection Policy available at [ellucian.com](http://ellucian.com) should be taken into consideration.

## Definitions

For the purposes of this Policy, the definitions set forth in Law 1581 of 2012 and Decree 1074 of 2015 shall apply, as transcribed below:

**Consent (Autorización):** The prior, express, and informed consent granted by the Data Subject for the Data Controllers to carry out the Processing of their Personal Data, in accordance with subsection (a) of Article 3 of Law 1581 of 2012 and Article 5 of Decree 1377 of 2013.

**Privacy Notice (Aviso de Privacidad):** Pursuant to paragraph 1 of Article 2.2.2.25.1.3. of Decree 1074 of 2015, the Privacy Notice is one of the options for verbal or written communication provided by law to inform Personal Data Subjects of the existence of and means of access to the Privacy Policy and the purpose of the collection and use of their data.

**Database (Base de Datos):** An organized collection of Personal Data that is subject to Processing, in accordance with subsection (b) of Article 3 of Law 1581 of 2012.

**Personal Data (Dato Personal):** Any information linked to or that may be associated with one or more identified or identifiable natural persons. Hereinafter, the terms "Personal Data" or "Data" mean any information linked to or that may be associated with one or more identified or identifiable natural persons.

**Data Subject (Titular):** A natural person whose Personal Data is subject to Processing.

**Sensitive Data (Dato Sensible):** Personal Data that affects the privacy of the Data Subject or whose misuse may lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social organizations, human rights organizations, or organizations that promote the interests of any political party,

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or that guarantee the rights and guarantees of opposition political parties, as well as Data relating to health, sexual life, gender identity, and biometric Data.

**Data Controller (Responsable del Tratamiento):** The natural or legal person, whether public or private, that by itself or in association with others decides on the Database and/or the Processing of Personal Data. In this case, it refers to Ellucian Tecnología de Colombia S.A.S.

**Data Processor (Encargado del Tratamiento):** The natural or legal person, whether public or private, that by itself or in association with others carries out the Processing of Personal Data on behalf of the Data Controller.

**National Database Registry (Registro Nacional de Bases de Datos):** The public directory of Databases subject to Processing, operated by the Superintendence of Industry and Commerce.

**Processing (Tratamiento):** Any operation or set of operations performed on Personal Data, such as collection, storage, use, circulation, or erasure, as well as Transfer and/or Transmission to third parties through communications, inquiries, interconnections, assignments, and data messages.

**Transfer (Transferencia):** Processing that takes place when the Data Controller and/or Data Processor of Personal Data, located in Colombia, sends Personal Data to a recipient that, in turn, is a Data Controller and is located within or outside the country.

**Transmission (Transmisión):** Processing of Personal Data that involves the communication to a third party within or outside the territory of the Republic of Colombia, when such communication is intended for the Data Processor to carry out Processing on behalf of and for the account of the Data Controller, in order to fulfill the latter's purposes.

## Guiding Principles for the Processing of Personal Data

The guiding principles shall be the fundamental basis that the Company will employ for the proper development and application of its Personal Data Processing Policy. Accordingly, all activities carried out shall be based on the following premises:

### Principle of Legality

The records supporting the consents granted by the Data Subjects shall be duly preserved by Ellucian. Likewise, compliance with current regulations for the collection of Personal Data shall be guaranteed, ensuring that consents are clear, explicit, and aligned with the guidelines established in applicable regulations. In this manner, legal obligations shall be continuously fulfilled, and the rights of Data Subjects shall be protected.

### Principle of Purpose Limitation

At all times, the reasons for which Data Subjects' Data has been collected shall be clearly communicated, and autonomy over its management shall be guaranteed to them. Control over the use of their information shall be recognized and respected, allowing them to determine the scope and duration of the Processing of their Data. However, it is clarified that certain

mandatory purposes, established by legal regulations, must be fulfilled and may not be revoked, as their annulment would be considered contrary to the legal obligations that must be met by Ellucian.

### **Principle of Freedom**

Data Subjects shall be guaranteed the full exercise of their rights with respect to the Processing of their Personal Data collected by Ellucian, ensuring that such process is carried out without restrictions or impediments. Likewise, they shall be recognized the right to request, at any time, such modifications, rectifications, or updates as they deem necessary to maintain the accuracy and currency of their Data.

The collection of information may only be carried out directly through the Data Subject or through a person duly authorized by the Data Subject, and any collection through unauthorized means is prohibited. Similarly, the disclosure of Personal Data shall only be permitted with the prior, express, and informed consent of the Data Subject. As the sole exception, information may be shared when required by a legal or judicial mandate, ensuring that the process is carried out under strict security and confidentiality measures to protect the rights and privacy of the Data Subjects.

In addition, clear and accessible mechanisms shall be implemented so that the rights of Data Subjects may be exercised easily, including the possibility of revoking the consent granted, provided that it does not involve Data whose Processing is mandatory under legal provisions. In this way, transparency, trust, and respect for the informational self-determination of each Data Subject shall be strengthened.

### **Principle of Accuracy or Quality**

The information subject to Processing shall be maintained with truthfulness, integrity, accuracy, currency, verifiability, and clarity, ensuring that it faithfully reflects the reality of the Data Subject. The forms designed by Ellucian, together with the various communication channels employed, shall be carefully structured to avoid any distortion, ambiguity, or misinterpretation, both of the Data collected and of the purpose of its collection.

It shall be required that the Data collected remain complete and accurate, ensuring that Data Subjects clearly and transparently understand the purpose for which their Data is collected and processed. It is strictly prohibited to process partial, incomplete, fragmented Data or Data that, by its nature, may lead to error, confusion, or misinterpretation, undermining the legitimate purpose of the Processing.

Likewise, the continuous review of stored Data shall be promoted in order to identify and correct any possible inconsistency or obsolescence. In the event that information failing to meet these standards is detected, it shall be rectified or deleted immediately, thereby ensuring the accuracy and reliability of the databases managed by Ellucian, and protecting the rights of Data Subjects at all times.

## **Principle of Transparency**

Data Subjects shall be guaranteed full access to detailed knowledge of the Data held by Ellucian. All information that has been stored, whether under the figure of direct controller or through a designated Data Processor, shall be made available to the Data Subject upon request, ensuring transparency in the handling of their Personal Data.

It shall be required that every request submitted by the Data Subject be duly channeled, managed, and responded to by Ellucian, acting as the central point of communication and facilitating the exercise of the Data Subject's rights.

Likewise, the Data Subject shall be provided with a clear and precise description of the purpose for which their Data is processed, the period during which it will be retained, and the mechanisms through which they may update, rectify, or revoke the consent granted.

In the event that information is managed by a third party acting as a Data Processor, it shall be guaranteed that requests directed to Ellucian are likewise forwarded and addressed in accordance with the guidelines established by current regulations and by this Policy.

In this manner, it shall be ensured that the Data Subject maintains control over their Personal Data and may exercise their rights effectively and without restrictions, consolidating trust in the information Processing activities carried out by Ellucian.

## **Principle of Restricted Access and Circulation**

The Processing of Personal Data shall be subject to the limits established by the very nature of the information, as well as to the provisions set forth in Colombian regulations and in the Political Constitution of the country.

Within this framework, the management of Data shall only be carried out by persons expressly authorized by Ellucian and/or those who have been designated for such purpose. The handling of and access to Data shall be restricted, ensuring that only the Data Subjects and duly authorized third parties may access them.

It shall be established that Personal Data, with the exception of information classified as public, shall not be made available through means that facilitate its dissemination or mass communication. In cases where access is required, it must be technically controlled, thereby ensuring restricted and protected knowledge.

The necessary measures shall be adopted to implement access barriers, encryption, and other security mechanisms that prevent the unauthorized disclosure of information. In this manner, the confidentiality and integrity of the Personal Data processed under the responsibility of Ellucian shall be safeguarded, in strict compliance with legal obligations and the principles of information security.

## **Principle of Security**

Regardless of whether it involves a Data Controller or a Data Processor, full compliance with all technical, human, and administrative measures established by Ellucian shall be required. These measures must be implemented to guarantee reasonable security in the protection of the Data belonging to the Data Subjects. At all times, the adulteration, loss, and/or destruction of information shall be prevented, and any unauthorized or fraudulent access, inquiry, or use shall be restricted.

It shall be required that safeguarding actions be applied constantly and proactively, ensuring that security barriers evolve in accordance with emerging risks. Likewise, the periodic updating of protocols shall be contemplated to strengthen resilience against potential vulnerabilities.

In addition, it shall be ensured that all persons involved in the Processing of Data receive ongoing training in security and confidentiality, consolidating an organizational culture that supports the integrity of information. Finally, compliance with these provisions shall be supervised through internal and external audits to verify that the measures implemented remain aligned with legal standards and international best practices in Data protection.

## **Principle of Confidentiality**

All employees and/or contractors involved in the Processing of Personal Data collected from Data Subjects, the nature of which is not public, shall be subject to the inescapable obligation to maintain the confidentiality of such information, both with regard to Personal Data and financial data. This obligation shall extend beyond the termination of their duties or the employment or contractual relationship, in compliance with legal provisions and previously established contractual terms.

Similarly, the Processing of Personal Data shall be carried out by Ellucian in accordance with the provisions of subsection (g) of Article 3 of Law 1581 of 2012, ensuring that the information is handled under strict confidentiality. The use of such Data shall be carried out solely and exclusively for the purposes previously established, provided that no objection has been raised by the Data Subject.

Periodic controls shall be implemented to ensure that confidentiality obligations are rigorously fulfilled, even after the termination of contracts or employment relationships. Employees and contractors shall undergo ongoing awareness-raising and training processes in Data protection, with the purpose of reinforcing the organizational culture of confidentiality and security.

Likewise, specific contractual clauses shall be established detailing the responsibilities arising from the management of confidential information, including proportionate sanctions in the event of non-compliance. The traceability of access and the management of Personal Data shall be regularly audited, ensuring that the use of information is strictly limited to the authorized purposes, without deviations that may compromise the privacy or rights of the Data Subjects.

### **Principle of Temporality**

Personal Data that is collected shall be retained only for the time that is reasonable and necessary to achieve the purposes established by Ellucian Tecnologia de Colombia S.A.S., as well as to ensure compliance with the applicable regulations in force with respect to such Data. To determine this period, the relevant legal provisions shall be taken into account, in addition to the administrative, accounting, tax, legal, and historical aspects that are relevant to the management of the information.

Likewise, it shall be ensured that Data is stored in alignment with the need to fulfill existing legal or contractual obligations. Once the purpose for which the Data was collected has been fulfilled and after the expiration of the periods defined according to the established criteria, the definitive deletion of the Data shall be carried out, ensuring that such erasure is performed through mechanisms that make its recovery or reconstruction impossible.

Periodic controls shall be implemented to review the validity and usefulness of the stored Data, ensuring that it is not retained beyond the strictly necessary time. In addition, the technical and organizational measures that guarantee the security of the Data during its retention period shall be reinforced, preventing any risk of unauthorized access, alteration, or loss. Finally, the Data deletion process shall be documented, recording the dates and methods used, in order to ensure traceability and transparency in compliance with this provision.

### **Principle of Necessity**

The Personal Data collected shall be used solely and exclusively to satisfy the needs related to the fulfillment of contractual and labor obligations and those essential for the execution of Ellucian's core business. Such information shall be processed in accordance with the previously established purposes, ensuring that its use remains strictly limited to the activities that are indispensable for the performance of the Company's own functions.

It shall be guaranteed that the Data is processed under parameters that prevent its improper use or diversion toward unauthorized purposes. Any other different purpose shall require the express consent of the Data Subject, unless a legal obligation determines otherwise.

Likewise, periodic controls shall be established to verify that the information continues to be aligned with the original objectives, restricting its storage beyond the time strictly necessary for the fulfillment of such purposes.

In the event that Data must be shared with third parties, this shall only be permitted when it is indispensable to fulfill Ellucian's core functions, and appropriate security measures shall be applied to protect the integrity, confidentiality, and availability of the information.

## Personal Data Subject to Processing

### Processing of Public Data

It is established that publicly available information may be processed by Ellucian without the need for a formal consent from the Data Subject or from their representative and/or legal guardian. Public information is understood to encompass information that is accessible to any entity, provided that it is not classified as reserved.

Such information shall be stored in the databases defined by Ellucian and, although it is of a public nature, it shall not exempt the responsibility of implementing the necessary measures to ensure compliance with the legal principles, duties, and obligations. Public information shall be processed and used for the following purposes:

- The dissemination of informational videos related to the economic activity carried out by Ellucian.
- The publication of content of interest directly related to Ellucian's core business.
- The provision of supplementary materials, such as technical bulletins.
- The promotion of Ellucian's current and future services, including information about offers, special discounts, invitations to organized events, sponsored events, or trade fairs.
- The communication of the mechanisms and means through which legal entities or natural persons may provide support to Ellucian.

### Processing of Semi-Private and Private Data

Private and semi-private Data shall be treated with the confidentiality and appropriate information security measures by Ellucian. Access to this information shall be permitted only on the condition that the Data Subject, or their representative and/or legal guardian in the case of minors, grants the corresponding consent. The use of such Data shall be strictly limited to the specific purpose for which it was collected, respecting the principle of purpose limitation at all times.

The Processing of private and semi-private Data shall be carried out by the areas designated within Ellucian, in addition to those that, due to their functions, require the management of this type of information. Such Data shall be used exclusively for the purposes that justify its knowledge and handling, ensuring that it does not deviate from the previously established objectives.

The necessary controls shall be implemented to ensure that the confidentiality, integrity, and availability of the information remain protected, and that any additional Processing is carried out in accordance with legal regulations and the Company's Policy.

### Processing of Sensitive Data

Sensitive Data shall be processed exclusively for the necessary purposes, following the principle of purpose limitation and in accordance with the purposes described in this Policy. The

Processing of such Data shall not be carried out without prior written consent signed by the Data Subject or, in the case of minors, by their representative and/or legal guardian.

All sensitive information shall require clear and prior consent, in which the Data Subject is accurately informed about the Processing to be carried out. Additionally, no activity shall be conditioned upon the provision of Sensitive Data, and the Data Subject shall be clearly informed that providing this information is voluntary.

Additionally, the consent of the Data Subject shall not be required in the following circumstances:

- When the law exempts the need to obtain such consent.
- When requesting the consent of the representative and/or legal guardian to protect the vital interest of the Data Subject, especially in cases where the Data Subject is physically or legally incapacitated.
- When the Data is essential for the recognition, exercise, or defense of a right in judicial proceedings.
- When the Processing pursues a historical, statistical, or scientific purpose within continuous improvement processes, provided that measures are adopted to ensure the dissociation of the Data Subject's identity so that they are not identifiable.

Sensitive Data shall be processed by the specialized areas of Ellucian—those that, by the nature of their functions, require the management of this type of information. Such Data shall be used strictly in accordance with the provisions of the corresponding consent requests for each counterpart, ensuring that the handling is carried out in accordance with the highest standards of confidentiality and security.

### **Special Authorization for the Processing of Sensitive Data**

The Company, through the mechanisms authorized for obtaining consent, shall ensure that all Data Subjects are duly informed, taking as reference the guidelines established in Law 1581 of 2012 and its supplementary regulations. It is expressly clarified that, in no case shall consent for the Processing of Sensitive Data be required, except in those scenarios where a legal or contractual mandate requires it.

When the Processing of Personal Data is related to health, all necessary measures shall be adopted to guarantee the confidentiality and protection of the information. The Processing of Sensitive Data shall be carried out solely in accordance with the purposes established in this document, and access thereto shall be strictly limited to personnel whose function within the Company requires knowledge of such information.

Likewise, Data classified as sensitive shall be collected by duly authorized third parties designated by the Company, who shall be responsible for managing the consent request in their own name. These third parties shall assume the responsibility of implementing information security measures in compliance with the guidelines and obligations established by the Company.

## **Processing of Minors' Data**

Data of minors shall be collected and used exclusively for the purposes previously authorized. Ellucian shall obtain prior consent for processing from the minor's legal representative.

Likewise, the necessary actions shall be implemented to guarantee the protection of the Personal Data of minors, prioritizing those measures aimed at safeguarding their fundamental rights. Specific protocols shall be adopted to ensure the confidentiality, integrity, and security of the information, with special emphasis on preventing any form of misuse, unauthorized access, or breach of the Data of children and adolescents.

The Processing of this information shall be carried out under strict protection standards, recognizing the condition of vulnerability of minors and ensuring that all collection, storage, and use of their Data is carried out ethically, transparently, and in accordance with current regulations.

## **Rights of Data Subjects**

### **Right of Access to Information**

The right of access to Personal Data shall be guaranteed exclusively to the Data Subject, in accordance with Law 1581 of 2012, provided that the Data Subject has been legitimately identified. Personal information shall be made available to the Data Subject at no cost, in a detailed and thorough manner, through the means authorized for these purposes by Ellucian.

To this end, the Data Subject or their representative/legal guardian shall be required to submit a request through the previously established channels, clearly stating the relevant inquiry, complaint, or request. In all cases, an identity document certifying their ownership over the information shall be attached, and, if applicable, the supporting documents evidencing legal representation.

### **Right to Rectification and Update of Data**

The rectification and update of personal information shall be carried out by Ellucian at the request of the Data Subject or their representative and/or legal guardian, in the case of a minor. Information that is incomplete or inaccurate and that may cause inconvenience to the Data Subject shall be corrected in accordance with the provisions of Article 22 of Decree 1377 of 2013, relating to the "Right to update, rectify, and erase Data."

In order to submit a request for rectification or update, the Data Subject must inform the Data Controller of the specific corrections that must be made and provide the necessary documentation proving their identity as the Data Subject or, failing that, their status as representative or legal guardian when the Data Subject is unable to make the request themselves. In this regard, Ellucian guarantees:

- That the rectification and update of Personal Data shall be carried out within the legally established period of 15 business days.

- That a tracking number shall be assigned to the request, allowing its traceability and follow-up in the corresponding database.
- That the Data Subject or their representative/legal guardian shall be promptly informed of the progress of the request and, in the event that the rectification or update has been completed, shall be provided with the evidence supporting such modification.

This process shall be carried out under the principles of transparency, promptness, and accuracy, ensuring that Personal Data is processed appropriately and in alignment with current regulations.

### **Right to Erasure of Data and/or Revocation of Consent**

The erasure of Personal Data and/or the revocation of consent for Processing may be requested at any time by the Data Subject or, alternatively, by their representative and/or legal guardian in the case of minors. Such request shall be submitted to Ellucian through the established channels, attaching the necessary documentation to verify the authenticity of the person making the request.

Additionally, the right to revoke consent for the Processing of Personal Data shall be recognized for all Data Subjects and/or their representative or legal guardian, and may be exercised at any time, unless a legal or contractual provision prevents it. Requests for revocation of consent shall be submitted through the channels previously established by Ellucian.

Revocation shall be managed by the Company under two modalities:

- **Total:** The revocation shall cover all previously consented purposes, meaning that Ellucian must completely cease the Processing of the Data Subject's Personal Data.
- **Partial:** The revocation shall apply only to certain purposes specified in the data consent, allowing Ellucian to continue processing the Data Subject's information only for the non-revoked purposes or with limitations on the use thereof.

Each request shall be analyzed and processed in a timely manner, ensuring that the rights of the Data Subject are respected and that the revocation is implemented in accordance with current Personal Data protection regulations.

The request for erasure and/or revocation of consent shall be denied when:

- A legal or contractual obligation prevents the deletion of the Data and requires the Data Subject to remain in the database.
- The deletion interferes with ongoing judicial or administrative proceedings related to tax obligations, criminal investigations, or the enforcement of administrative sanctions.
- The request submitted is unclear, incomplete, or raises doubts about the authenticity of the person filing it.

The entire process shall be managed ensuring the protection of the Data Subject's rights, respecting current legal provisions, and ensuring that the information is processed appropriately and transparently.

### **Right to File Complaints, Claims, or Take Legal Action**

The right to file complaints and claims shall be guaranteed to the Data Subject. For the management of such requests, the conditions established in Law 1581 of 2012 shall apply, as follows:

- The complaint or claim shall be submitted through a request that includes the identification of the Data Subject and/or representative or legal guardian, a description of the facts giving rise to the claim, the address, and the documents the applicant wishes to submit. If the request is incomplete, the interested party shall be required to cure the deficiencies within a maximum period of five (5) business days from receipt of the claim. If two (2) months elapse from the date of the requirement without the missing information being received, it shall be understood that the claimant has withdrawn the request.
- In cases where the claim is received by a person or department not competent to resolve it, it shall be forwarded to the appropriate body within a maximum of two (2) business days, and the interested party shall be informed of said referral.
- Once the complete claim is received, the database shall be updated reflecting the status and reason for the claim.
- The maximum period for responding to the claim shall be fifteen (15) business days, counted from the business day following receipt of the request. If it is not possible to resolve the claim within that period, the interested party shall be informed of the reasons for the delay and a new response date shall be indicated, which may not exceed eight (8) business days after the expiration of the initial period.
- All requests, claims, and complaints shall be managed exclusively through the official channels authorized by the Company, ensuring the traceability and proper Processing of each request.

This process shall be carried out in accordance with the principles of confidentiality, timeliness, and transparency, ensuring that the Data Subject's rights are protected at all times.

### **Right to Request Proof of Consent**

The right to request proof of the consent granted to Ellucian shall be guaranteed to the Data Subject. For the management of such requests, Ellucian shall apply the conditions established in Law 1581 of 2012. In this regard, the Data Subject's request shall proceed in all cases except when consent is expressly exempted as a requirement for Processing, in accordance with the provisions of Article 10 of Law 1581 of 2012.

### **Right to File Complaints before the Superintendence of Industry and Commerce**

The right to file complaints before the data protection authority, i.e., the Superintendence of Industry and Commerce, for violations of the provisions of Law 1581 of 2012 and its implementing decrees, shall be guaranteed to the Data Subject.

## Purposes of Personal Data Processing

The Company has established the Processing of Data considering the various available means of contact and the type of counterpart involved. Therefore, various purposes for the handling of collected Personal Data have been determined. Furthermore, such Processing shall be carried out in accordance with the consent granted by the Data Subject, in addition to taking into account the provisions of the chapter titled "Collection and Use of Information" of the corporate global Personal Data protection policy. The global Personal Data protection policy is available for consultation at [ellucian.com](http://ellucian.com).

In this regard, the additional purposes beyond those described in said chapter are as follows:

### **Personal Data Collected from Website Visitors and Representatives of Prospective Clients**

The Company shall apply the purposes defined within the chapter titled "Website Visitors and Representatives of Prospective Clients" of the corporate global Personal Data protection policy, including the cookies statement. The policy is available at [ellucian.com](http://ellucian.com).

### **Data Collected through External Websites**

The Company shall apply the purposes defined within the chapter titled "External Websites" of the corporate global Personal Data protection policy, which is available at [ellucian.com](http://ellucian.com).

### **Data of Candidates in Recruitment Processes**

The Company shall process the Personal Data of candidates who apply for vacancies or are contacted through any means, including, among others, employment platforms such as LinkedIn, job boards, direct channels, or referrals, for the purpose of comprehensively managing recruitment and hiring processes.

In the case of information obtained through third-party platforms, such as LinkedIn or job boards, the Company shall act as the Data Controller with respect to the Data it collects directly, without assuming responsibility for the prior processing carried out by such platforms. In these cases, when necessary, the Company shall request the corresponding consent to contact the candidate directly and continue with the process.

Personal Data shall be processed, in addition to what is established in Ellucian's Privacy Notice for Applications, for the following purposes:

- Contacting the candidate through available channels to inform them about job opportunities, confirm their application, and coordinate interviews, tests, and other stages of the selection process.
- Requesting, updating, and managing the candidate's résumé and supporting documents.
- Evaluating the candidate's profile, verifying compliance with vacancy requirements, and validating the information provided, including the verification of education, experience, and professional and personal references.

- Conducting selection tests, assessments, technical evaluations, psychometric tests, or tests of any other nature, directly or through third parties, as well as analyzing their results.
- Sharing the information with the corresponding internal departments and with third-party Data Processors participating in the candidate's selection or evaluation process.
- Maintaining a record of the candidate's participation in selection processes, including attendance, results, and process status, as well as retaining their information for future job opportunities.
- Contacting the candidate to invite them to participate in future selection processes when their profile is suited to other vacancies.
- Transferring or transmitting the Personal Data to third-party Data Processors when necessary for the management of selection processes or for the identification of job opportunities within the Company.
- Complying with legal obligations or requests from competent authorities.

In the event that the candidate is selected, the Company shall process their Personal Data to carry out the activities necessary for their onboarding, including:

- Managing the hiring process and the formalization of the employment or contractual relationship.
- Verifying and validating the information provided by the candidate and their supporting documents.
- Managing enrollments in the social security system and family compensation funds.
- Administering beneficiary and family information when necessary for the management of benefits or compliance with legal obligations.
- Coordinating, managing, and receiving the results of occupational medical certificates through authorized third parties, as well as retaining such information confidentially in accordance with applicable occupational health and safety regulations.
- Conducting background checks when appropriate.

The Company may retain the information of non-selected candidates for a maximum period of seven (7) years, in order to consider them in future selection processes, and indefinitely with respect to those candidates who are hired, in accordance with applicable legal obligations.

It is hereby informed that résumés may include Sensitive Data, such as photographs or health information. The provision of such data is voluntary and its processing shall be carried out based on prior, express, and voluntary consent, guaranteeing in all cases its confidentiality and restricted use for the purposes described herein.

In the event that Personal Data of minors is processed, the Company shall request the prior consent of the legal representative and shall ensure respect for the best interests of the minor. Any processing activity, including evaluations, examinations, or potential data transfers, shall be subject to such consent.

The Company shall implement security measures to protect the Personal Data it directly collects and shall guarantee its processing in accordance with current personal data protection regulations.

### **Employee Data**

Employee Data shall be understood as that of individuals who have legally formalized their engagement with the Company; therefore, it is understood as data pertaining to those who have an employment contract regardless of its modality. In consideration of this, the Company, in addition to what is established in Ellucian's Employee Privacy Notice, contemplates the following purposes:

- Ensuring effective communication to share relevant information related to the employee's contractual relationships.
- Fulfilling the labor obligations assumed by the Company, including salary matters, social benefits, and other aspects established in the contracts.
- Transferring personal information to the entities necessary to ensure compliance with the Company's contractual and legal obligations.
- Implementing the guidelines corresponding to the General Social Security System.
- Registering the employee in the tools and technologies that the Company deems necessary for onboarding processes.
- Disseminating information about agreements, strategic partners, news, and other matters of interest to the employee.
- Managing enrollments, settlements, and other payroll-related processes, including the generation of income and withholding certificates.
- Informing the employee and, if applicable, their representative or legal guardian of any modification related to their employment contract.
- Conducting internal surveys on employee habits to understand and improve the work environment.
- Analyzing the results of such surveys in order to implement improvements in the organizational climate.
- Sending employee information to the parent company through the channels established by the Company, as required.
- Using the Data provided to contact a family member or designated person in the event of an emergency.
- Notifying the employee about events organized by the Company that may be of interest.
- Using the employee's information to consider their possible promotion within the Company.
- Capturing and using the employee's image, in physical or digital format, for corporate purposes. The employee shall be previously informed and shall give their consent for such use.
- Authorizing the Company to validate their education whenever necessary and to submit supporting documents in the event of an update to their information.

- Requesting the signature of documents when required by the Company in accordance with its job description manual.
- Maintaining a record of the activities performed by the employee, including occupational medical certificates, managed through the designated providers.
- Storing information in digital or physical format, as applicable, to support the employee's tenure at the Company in accordance with the execution of the contract.
- Processing the information necessary to ensure compliance with tax, contractual, commercial, and accounting obligations, among others required.
- In cases where the Company deems it appropriate, using the employee's personal telephone number as a corporate telephone number for the purpose of maintaining communication with stakeholders.
- Managing relevant information by the Company and communicating it through the personal channels authorized by the employee.

### **Data Collected Related to Health**

The Company may process personal data related to the health of its employees only on an exceptional and restricted basis, in their capacity as sensitive data, and in strict compliance with the provisions of Colombian personal data protection regulations. Consequently, such processing shall be carried out exclusively when there is a legal basis that authorizes it, such as compliance with legal obligations in the area of occupational health and safety, the protection of the life or integrity of the data subject, or when the prior, express, and informed consent of the worker has been obtained.

The processing of this information shall have the following specific purposes: (i) fulfilling legal and regulatory obligations regarding the Occupational Health and Safety Management System (SG-SST); (ii) preventing, identifying, evaluating, and controlling occupational risks; (iii) managing disabilities, workplace accidents, and occupational diseases; (iv) adopting reasonable accommodation measures in the work environment when necessary; and (v) addressing emergency situations that may compromise the life or integrity of the worker or third parties.

In any case, the Company shall apply the principle of data minimization, so that it shall only collect and process the information strictly necessary for the authorized purposes. In particular, it shall avoid access, storage, or use of detailed medical diagnoses, medical records, or other information that is not indispensable, favoring the processing of data such as fitness assessments, medical restrictions, or occupational recommendations.

Health data may be shared, when necessary, with third-party Data Processors such as occupational risk administrators (ARL), healthcare providers, and occupational health and safety service providers, who shall guarantee the confidentiality and security of the information in accordance with the law.

The Company shall adopt reinforced technical, human, and administrative measures to protect this data, ensuring its restricted access only to authorized personnel and preventing any improper or discriminatory use.

The provision of sensitive data by the worker is voluntary. However, in those cases where such information is necessary for the fulfillment of legal obligations or for the proper management of occupational health and safety, the failure to provide it may limit the Company's ability to carry out such activities.

### **Data of Employees upon Termination of Employment**

For the Company, the Data collected and stored from an employee who terminates their employment relationship corresponds to that which forms part of their personnel file, which must be preserved for a maximum of ten (10) years, as opposed to the employment history which involves records that must be compulsorily retained.

The Data of employees who terminate their employment relationship with the Company shall have the following purposes for Processing:

- Managing the scheduling of occupational medical appointments, providing the necessary information to the corresponding entities to coordinate the performance of exit examinations.
- Recording, coordinating, and facilitating the employee's attendance at exit medical examinations, through the entity with which a commercial agreement is maintained for such procedure.
- Receiving, storing, and retaining the occupational physician's certificates for the required time, in order to verify and document the employee's health status at the time of their departure from the Company.
- Sending the former employee the results of their medical examinations via the email address they provided for this purpose.
- Forwarding the documentation corresponding to the separation process to the responsible department, ensuring the proper completion of the employment termination process.
- Contacting the former employee to present a new job opportunity, taking into account their performance results prior to their separation.

### **Data Collected from Minors**

The Company shall ensure that the Processing of Personal Data of children and adolescents is carried out with respect for their fundamental and prevailing rights. This information shall only be used in accordance with their best interests, in compliance with the provisions of Law 1581 of 2012 and Chapter 25 of Title 2 of Part 2 of Book 2 of Decree 1074 of 2015.

The Processing of such Data is prohibited, except when it involves public information, in accordance with Article 7 of Law 1581 of 2012, and provided that the following requirements are met:

- That the Processing responds to and respects the best interests of children and adolescents.
- That it guarantees the protection of their fundamental rights.

The controllers and processors of this information shall ensure its proper use, applying the principles and obligations established by the aforementioned regulations. The Company, within  
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the framework of its legal competencies, shall promote the training of representatives and/or legal guardians regarding the potential risks associated with the improper Processing of minors' Personal Data. Furthermore, it shall foster awareness of the responsible and safe use of their personal information, highlighting their right to privacy and the protection of their Data and that of others.

Based on these premises, the Company may collect and retain the Personal Data of minors for the following purposes:

- Offering benefits to the minor children of our employees, for which limited processing of the minor's information is necessary.
- Offering support and assistance to minor students who wish to participate in the "Raise Me" program offered by the Company.

### **Data Collected from Prospective Clients**

For the Company, prospective clients are understood as any legal entity to which a service may be offered. It is clarified that the Data collected shall be used solely to create relationships with prospective clients. Additionally, the provisions defined in the chapter titled "Ellucian's Role as Processor or Service Provider to its Clients" and "Client Responsibilities with Respect to their Personal Data" of the corporate global policy available at [ellucian.com](http://ellucian.com) shall be considered first, along with the following supplementary purposes:

- Conducting market research using information obtained from public and legitimate sources, with the purpose of identifying trends, opportunities, and market needs.
- Contacting prospective clients through emails and/or telephone calls, provided that the information originates from public sources or, alternatively, prior consent is obtained.
- Analyzing the collected information to design a service portfolio aligned with the needs identified during the outreach and commercial visit process.
- Requesting additional information through the client knowledge form, facilitating their possible engagement in a transparent manner and in compliance with applicable regulations.
- Segmenting and profiling prospective clients in order to offer personalized products and services, tailored to their interests, characteristics, and the results obtained in the prior analysis.
- Verifying the authenticity and reliability of the information provided by prospective clients through validation with the corresponding state oversight entities.
- Developing innovative and effective commercial strategies focused on expanding business opportunities and fostering sustainable commercial relationships with prospective clients.
- Conducting screenings against restricted and control lists established by the Company, ensuring compliance with Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation of Weapons of Mass Destruction regulations, guaranteeing transparency and integrity in the onboarding of new clients.

## Data Collected from Active Clients

For the Company, an active client is understood as any legal entity that has acquired the products and/or has a current commercial contractual relationship. The Company and its Data Processors shall first consider the provisions defined in the chapter titled "How Ellucian Uses Client Data" and the chapter "Purposes of Collection and Use of Personal Data" of the corporate global policy available at [ellucian.com](http://ellucian.com), in addition to the following purposes regarding the Data collected:

- Carrying out the client identification and validation process, ensuring their proper acceptance according to the Company's policies.
- Managing accounts receivable and collection processes, ensuring compliance with the agreed-upon terms and conditions.
- Requesting, storing, consulting, updating, correcting, processing, clarifying, and, when necessary, deleting the information and documentation provided, maintaining the integrity of the Data.
- Disclosing the Company's name to third parties for the purpose of strengthening commercial relationships and facilitating marketing opportunities aligned with the business strategy.
- Issuing the sales invoice in accordance with the terms and conditions established in the contractual relationship.
- Sending the sales invoice through the channels previously defined by the Company to ensure efficient communication.
- Conducting financial and creditworthiness analyses of the client, in order to assess the feasibility of granting credits or establishing flexible payment terms.
- Contacting the legal representative, alternate, or person designated as liaison, in order to strengthen and maintain the commercial relationship.
- Promoting current and future products and services, including offers, discounts, events, and any other relevant benefit for clients and aligned with the Company's business model.
- Strictly fulfilling the contractual obligations established in the agreements executed between the parties.
- Requesting the additional information necessary to ensure compliance with the commitments established in the commercial contracts.
- Maintaining the collected information to ensure the proper execution of the commercial agreement.
- Supporting the execution of contracts and commercial agreements, including the submission of required documentation to regulatory authorities when necessary.
- Retaining the basic data of the client's company and key contacts after the termination of the commercial relationship, in order to keep open the possibility of future offers and marketing campaigns.
- Administering the information necessary to comply with legal, tax, commercial, corporate, and accounting obligations, ensuring transparency and order in the Company's records.

## Data Collected through Marketing Activities

This consent shall allow us to manage Data in order to properly carry out activities related to events, sponsorships, and future collaboration opportunities. The Company details the specific purposes for which the information required as a result of the activities carried out by marketing shall be used:

- Granting the Company the right to use the Data and materials provided, ensuring the proper brand exposure according to the benefits established in the contracted sponsorship package.
- Accepting the receipt of promotional communications and marketing campaigns about future sponsorship opportunities, including details about new packages and their benefits.
- Authorizing the use of the logos provided to be integrated into promotional materials, digital media, visual elements, and any other resource agreed upon to provide brand visibility.
- Allowing the Company to store my Personal Data (name, email, telephone, and other basic information) to facilitate communication about upcoming events, invitations, and commercial activities.
- Approving that the Company share my basic Data (name, position, company, and email) with other sponsors linked to the event, with the aim of fostering networking and potential commercial collaborations, always respecting data protection regulations.
- Authorizing the update of my Personal Data and that of my company in the Company's records, provided that an active commercial relationship exists.
- Allowing the Company to share my Data with advertising agencies or strategic partners when necessary to coordinate promotional activities related to the sponsorship or event.
- Accepting that the Company use my Personal Data to prepare badges, credentials, access cards, or other elements necessary to identify attendees and sponsors during the event, as well as to analyze my attendance patterns at such events.

## Data Collected from Prospective Suppliers

For the Company, prospective suppliers are understood as any natural and/or legal person to which a service may be offered. It is clarified that the Data collected shall be used solely to create relationships with prospective suppliers, considering the following supplementary purposes:

- Conducting market research using information obtained from public and legitimate sources, with the aim of identifying strategic suppliers, evaluating their capabilities, and detecting opportunities that add value to the supply chain.
- Contacting prospective suppliers through emails and/or telephone calls, provided that the information originates from public sources or, alternatively, consent is obtained after the first contact, promoting commercial alliances that strengthen operations.
- Analyzing the collected information to develop a supplier portfolio aligned with operational requirements, ensuring efficiency, quality, and sustainability in the provision of services or supply of products.

- Requesting additional information through the supplier knowledge form, facilitating their possible engagement in a transparent manner and in compliance with applicable regulations, ensuring traceability and regulatory compliance.
- Segmenting and classifying prospective suppliers according to their capabilities, experience, certifications, and alignment with the Company's strategic objectives, prioritizing those that offer innovative and competitive solutions.
- Verifying the authenticity and reliability of the information provided by prospective suppliers through validation with state oversight entities and other relevant sources, ensuring suitability and legal compliance.
- Developing collaboration strategies to strengthen relationships with key suppliers, promoting innovation, efficiency, and mutual long-term value creation.
- Conducting screenings against restricted and control lists established by the Company, ensuring that the selected suppliers comply with Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation of Weapons of Mass Destruction regulations, protecting the reputation and integrity of the Company.

### **Data of Inactive Clients**

The Company shall retain the information of counterparts with which relations have ceased to cover the following purposes:

- Contacting the inactive client to present new offers, services, or products that may be of interest, incentivizing the reactivation of the commercial relationship.
- Conducting surveys or studies to understand the reasons for inactivity and evaluate the previous experience with the Company, seeking improvement opportunities.
- Sending information about special promotions, new developments, events, or exclusive benefits designed to recover interest and encourage the continuity of the commercial relationship.
- Requesting and updating personal and contact information, ensuring that the Company's records remain accurate and complete for future commercial activities.
- Analyzing historical Data and consumption patterns to identify business opportunities, as well as designing more effective commercial strategies aligned with their possible current needs.
- In applicable cases, continuing with the management of outstanding balances or account clarifications, according to the terms established in prior agreements.
- Retaining the necessary information to comply with tax, accounting, and regulatory obligations established by law, even when the commercial relationship has ceased.

### **Data Collected from Suppliers and/or Contractors**

For the Company, suppliers and/or contractors are understood as any natural and/or legal person that plans to provide a good or service. Therefore, the Data collected from suppliers and/or contractors, regardless of the means through which it is collected, is limited to:

- Being able to receive the proposal for the good or service to be supplied and initiating the supplier selection process, in accordance with established internal procedures.
- Providing information to third parties for the evaluation and classification of suppliers.
- Requesting information related to the onboarding and acceptance of suppliers.
- Conducting screenings against restricted lists and mass media in accordance with the Company's internal policies.
- Using the information necessary for the administration of suppliers and contractors that have a relationship with the Company.
- Receiving the invoice in accordance with the fees and payment terms defined and approved by the parties.
- Making payments of the agreed-upon fees.
- Keeping supplier information duly updated.
- Storing, consulting, rectifying, processing, updating, clarifying, and/or destroying the information and documentation provided.
- Carrying out the activities inherent in the provision of the service for the fulfillment of the different contractual stages.
- Generating the contractual certifications required by the Company's contractors or as requested by oversight entities.
- Sending contractual certifications to the contractors and/or oversight entities as applicable.
- Maintaining a digital file that allows for the retention of the corresponding information for each contract.
- Managing the information necessary for the fulfillment of tax, contractual, commercial, and commercial registration, corporate, and accounting obligations.

## **Transfer and Transmission of Information**

The Company may carry out transfers and/or transmissions of the Data Subjects' Personal Data in accordance with the purposes contained in this Policy. In all cases, Ellucian shall fully comply with the guidelines established in the chapter "Transfer of Data to Third Parties" of the corporate global Personal Data protection policy available at [ellucian.com](http://ellucian.com).

## **Person or Department Responsible for Handling Data Subject Petitions, Inquiries, and Claims**

The Privacy department has been designated by Ellucian as the department responsible for handling petitions, inquiries, complaints, and claims. To file and have your inquiries or claims addressed, please contact the person responsible for handling requests, petitions, complaints, and claims at Calle 72 No. 5-83, 4th floor, in the city of Bogotá D.C., Colombia, by email at [privacy@ellucian.com](mailto:privacy@ellucian.com).

## **Procedure for Handling Inquiries, Claims, and Petitions**

### **Procedure for Handling an Inquiry**

Data Subjects and/or their representative or legal guardian may exercise the right to make an inquiry regarding all information that the Company holds in the individual record or that is related to the Data Subject, by sending an email to the contact channel provided in this Policy and additionally providing the following information to verify their identification:

- Identity document of the Data Subject at 150% (in the case of a minor, a copy of the birth certificate and/or a document certifying that the person is the legal representative and/or guardian, other than the identity document, must be provided).
- Time period for which the inquiry is to be made.
- If the Data Subject wishes to inquire about a specific matter, they may clarify this when sending the email.
- Contact telephone number.
- Physical and/or electronic address (email) through which they wish to receive the response.

The inquiry shall be addressed within a maximum period of ten (10) business days from the date of receipt thereof, provided that it meets all the previously mentioned requirements. When it is not possible to address the inquiry within said period, the interested party shall be informed, stating the reasons for the delay and indicating the date on which the inquiry will be addressed, which in no case may exceed five (5) business days following the expiration of the initial period.

### **Procedure for Filing a Claim**

Data Subjects and/or their representative or legal guardian may exercise the right to file a claim whenever they consider that the information stored by the Company is being misused or that there is an abuse by the Company regarding the Data collected. To do so, an email shall be sent to the contact channel provided in this Policy, additionally providing the following information:

- Identity document of the Data Subject at 150% (in the case of a minor, a copy of the birth certificate and/or a document certifying that the person is the legal representative and/or guardian, other than the identity document, must be provided).
- A description of the facts giving rise to the claim, along with the supporting documentation and/or documents that the claimant considers necessary or that may help the Company better understand the facts. It is important to clarify that, if the claim is incomplete, the interested party shall be required within five (5) days following the claim to cure the deficiencies and/or inconsistencies. If two (2) months elapse from the date of the claim without the applicant submitting the required information, it shall be understood that the claimant has withdrawn the claim. In the event that the person who receives the claim is not competent to resolve it, it shall be forwarded to the appropriate party within a maximum period of two (2) business days, and the interested party shall be informed of the situation.

- Contact telephone number.
- Physical and/or electronic address (email) through which they wish to receive the response.

The claim shall be addressed within a maximum period of fifteen (15) business days from the date of receipt thereof, provided that it meets all the previously mentioned requirements. When it is not possible to address the claim within said period, the interested party shall be informed, stating the reasons for the delay and indicating the date on which the claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the initial period.

### **Procedure for Data Update and/or Rectification**

Data Subjects and/or their representative or legal guardian may exercise the right to update and/or rectify their Data whenever they consider that the information stored by the Company is outdated or erroneous. To do so, an email shall be sent to the contact channel provided in this Policy, additionally providing the following information:

- Identity document of the Data Subject at 150% (in the case of a minor, a copy of the birth certificate and/or a document certifying that the person is the legal representative and/or guardian, other than the identity document, must be provided).
- Specify the data to be rectified and/or updated, along with the reasons giving rise to this situation and any supporting documentation deemed pertinent.
- Contact telephone number.
- Physical and/or electronic address (email) through which they wish to receive the response.

The request shall be addressed within a maximum period of ten (10) business days from the date of receipt thereof, provided that it meets all the previously mentioned requirements. Likewise, if necessary, mechanisms that facilitate the exercise of this right by the Data Subject shall be made available, provided that they are beneficial to the Data Subject. Accordingly, electronic means or other means deemed appropriate may be enabled, which shall be communicated in the privacy notice and made available to the interested parties.

### **Procedure for Erasure, Deletion, and/or Revocation of Data or Purposes**

Data Subjects may revoke their consent to the Processing of their Personal Data or the purposes thereof at any time, partially or totally, provided that:

- It is not prevented by a legal or contractual provision.
- The Data Subject has a legal or contractual duty to remain in the database.
- The deletion of Data would obstruct judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes, or the enforcement of administrative sanctions.
- The Data is necessary to protect the legally protected interests of the Data Subject; to carry out an action in the public interest; or to fulfill an obligation legally acquired by the Data Subject.

Likewise, the Company reminds Data Subjects that their Data may be erased, deleted, and/or suppressed whenever, as Data Subject, they consider that:

- The Data is not being processed in accordance with the principles, duties, and obligations provided for in current regulations.
- The Data has ceased to be necessary or relevant for the purpose for which it was collected.

On the other hand, the Company may partially or totally delete the Data collected when the purpose for which it was collected is no longer considered necessary. In such case, the Data Subject shall be notified that the purpose has ceased to exist, and the Data used for said purpose shall be deleted, provided that it does not affect other existing purposes.

Finally, an email shall be sent to the contact channel provided in this Policy, additionally providing the following information:

- Identity document of the Data Subject at 150% (in the case of a minor, a copy of the birth certificate and/or a document certifying that the person is the legal representative and/or guardian, other than the identity document, must be provided).
- Specify the data to be erased, deleted, or revoked, along with the reasons giving rise to this situation and any supporting documentation deemed pertinent.
- Contact telephone number.
- Physical and/or electronic address (email) through which they wish to receive the response.

### **Validity Period of the Databases**

This Policy shall be effective as of March 26, 2026.

The Personal Data included in the Databases for which Ellucian acts as Data Controller shall remain in such Databases as long as their Processing is necessary for the fulfillment of the purposes for which they were collected or, alternatively, as long as a legal duty exists relating to the retention of such information.

### **National Database Registry**

The Company shall register its databases together with this Personal Data Processing Policy in the National Database Registry administered by the Superintendence of Industry and Commerce, in accordance with the procedure established thereby.