



Transforming the future economy with technology  
for the care of older people (+60) in LAC

## **PERSONAL DATA PROCESSING POLICY**

### **1. RESPONSIBLE FOR PERSONAL DATA**

In compliance with the Political Constitution of Colombia, Law 1581 of 2012, Regulatory Decree 1377 of 2013, and other regulatory provisions, this Personal Data Handling Policy (hereinafter “the Policy”) establishes how Fundación Arturo Sesana or FAS, a non-profit entity duly incorporated in Colombia, identified with Tax Identification Number (NIT) No. 900.120.528-6, located in the city of Bogotá, D.C. and with offices at Cl. 93B #12-18 Office 301, email address [regionplateada@faes.org.co](mailto:regionplateada@faes.org.co) and phone number (57 1) 6358680 collects and processes personal data (hereinafter “Personal Data”) of participants who register in the Silver Region calls for proposals (hereinafter “Participants”), collected through websites and/or internet platforms set up for Silver Region calls for proposals (hereinafter the “Site”), the cookies or web beacons incorporated into the Site, or by any other means, present or future, used by Fundación Arturo Sesana.

### **2. PERSONAL DATA SUBJECT TO PROCESSING BY FAS**

To comply with the obligations and activities indicated in this Policy, FAS collected the following Personal Data through the Platform:

- Full name
- Email address
- Date of Birth
- Office Address
- Home address
- Nationality
- Company
- General commercial or financial information about the company
- Gender
- Occupation
- Phone number

### **3. PURPOSES OF THE PROCESSING OF PERSONAL DATA**

FAS will collect, store in its databases, use, share, and delete the Personal Data to carry out and manage the Silver Region calls for proposals, from start to finish. In this context, FAS will process your data to:

- i) advise Participants on Silver Region initiatives;



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- ii) identify the user as a primary means of contact for informational follow-up, to follow up on user activities as part of the initiatives for the Silver Region, to send simple notifications and implement personalized content communication tools based on the user's profile;
- iii) verify the compliance with the terms of the call, segment audiences, personalize informational content, create a tracking profile, and optimize resource delivery to the participants of the initiatives for Silver Region;
- iv) classify the strategic needs of the initiatives for the Silver Region and conduct training, support, and engagement actions with other entities involved in the initiatives for the Silver Region;
- v) review compliance with agreements with organizations, decide on activities for the initiatives and solutions for Silver Region;
- vi) conduct mapping of the Latin American caregiver ecosystem and present each client with their respective diagnosis completed by Grupo Impacta, and
- vii) fulfill the contractual obligations with clients and, in particular, with Fundación Arturo Sesana.
- viii) transfer Personal Data provided by the Participants within and outside the country to a) their affiliated, subsidiary, and/or related companies; b) Fundación Arturo Sesana, the contracting side of Silver Region initiatives, its employees and collaborators in Colombia and abroad; c) third-party service providers for Silver Region for compliance with the legal, accounting, regulatory obligations of Fundación Arturo Sesana; d) third parties for marketing, information technology, operation, administration, commercialization, business development, and other similar and lawful purposes; as well as to comply with legal provisions requiring it, or when requested by competent authorities.

#### **4. EXCLUSION OF PERSONAL DATA OF MINORS AND SENSITIVE DATA FROM PROCESSING**

Fundación Arturo Sesana will not process the personal data or sensitive data of minors

The Participants of the calls declare that they are of legal age and, by participating in the calls, grant their permission for FAS to process their data by this Personal Data Processing Policy.

#### **5. RIGHTS OF PERSONAL DATA HOLDERS**

Following Article 8 of Law 1581 of 2012, FAS informs you that you have the following legal rights:



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- To know, update, and correct your Data with FAS. This right can be exercised, among others, about information that is partial, inexact, incomplete, divided, or misleading or whose processing is prohibited or unauthorized.
- Require proof of the consent granted to FAS for the collection and processing of your Personal Data, have access to your Data that is subject to processing by FAS, and, in general, be informed by FAS regarding the processes carried out on your Data. Thus, it is important to follow the procedures established in Section 8 of this Policy.
- Revoke the authorization granted to FAS and/or request the deletion of your Data when you believe FAS is not respecting constitutional and legal principles, rights, and guarantees. In these cases, FAS will inform you regarding the implications that revoking your authorization or deleting your Data from the database may have.
- Have access to the Personal Data that FAS has collected and processed.
- If you are not satisfied with the way FAS handles your Personal Data or you have any complaint or claim, you may submit a statement to FAS's Data Protection Officer at the following email address, [regionplateada@faes.org.co](mailto:regionplateada@faes.org.co)
- If FAS's Data Protection Officer does not resolve your concerns or address your complaints, you may contact the Superintendencia de Industria y Comercio to present your concerns, complaints, or claims if you believe FAS has violated your data protection rights under Law 1581 of 2012, Regulatory Decree 1377 of 2013, or other regulations that modify, add to, or complement them.

## 6. THE DEPARTMENT RESPONSIBLE FOR RESPONDING TO INQUIRIES, REQUESTS, OR CLAIMS RELATED TO THE PROCESSING OF YOUR DATA

If you have questions, inquiries or claims related to your Personal Data, you may contact FAS's Personal Data Officer at the following email address [regionplateada@faes.org.co](mailto:regionplateada@faes.org.co) (hereinafter the "Personal Data Officer"). You may exercise your right to know, update, revise, or delete your Personal Data and revoke the consent you granted to FAS to process your Personal Data with this Personal Data Officer of FAS.

## 7. FAS SECURITY POLICY

FAS has adopted effective, appropriate, and reasonable methods to protect your Personal Data from loss, improper use, unauthorized access, distribution, alteration, and destruction.

## 8. PROCEDURE TO EXERCISE YOUR RIGHTS AS A PERSONAL DATA HOLDER

Any questions or concerns regarding the Personal Data collected or processed by FAS will be handled by FAS's Personal Data Officer. To do so, a written statement with your concern should be addressed to [regionplateada@faes.org.co](mailto:regionplateada@faes.org.co).

FAS's Data Protection Officer will resolve your question or concern within ten (10) business days after the question or concern is received. If FAS's Data Protection Officer is unable to respond to your claim within the stated timeframe, FAS's Data Protection Officer will inform



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you of the situation and will provide a reason for the delay. Regardless, FAS's Data Protection Officer will respond within five (5) business days following the expiration of the initial ten (10) business day period.

If you believe that the information contained within the FAS database requires correction, updating, or deletion, or if you believe that FAS is not complying with its obligations according to Law 1581 of 2012, you should submit a complaint to FAS, addressed to the Data Protection Officer, which will be handled in according to the procedure established in Article 15 of Law 1581 of 2012.

## **9. FAS DISCLAIMER OF LIABILITY**

When browsing or using the Site the User may encounter hyperlinks or hypertext "links", banners, buttons and/or search tools on the World Wide Web that, when used by Participants, lead to other third-party portals or websites. Personal Data provided by Participants to these portals or websites will not be subject to processing by Fundación Arturo Sesana by this Policy, but rather by the respective third-party website according to their own Personal Data Processing Policy. Therefore, the processing of such data is not the responsibility of Fundación Arturo Sesana. We recommend that Participants verify who is responsible for such processing and review their Personal Data Processing Policy that is displayed and applicable to these portals and websites before providing their Personal Data.

## **10. COOKIES AND WEB BEACONS**

To improve the Participants' experience on the Site, Fundación Arturo Sesana will use "cookies", which consist of text archives automatically downloaded and stored on the Participants' devices once they browse the Site and grant permission for the internet server to remember certain information about the user including their preferences for viewing pages on that server, username, and password. The Fundación Arturo Sesana also uses "web beacons" on its Site, which consists of images embedded in the Site aimed at monitoring visitor behavior, such as storing information about the Participant's IP address, length of interaction on the page, and the type of browser used, among other details.

Participants can change their settings through their computing devices and/or browsers to refuse "cookies" and/or "web beacons", or confirm whether they accept them or not themselves.

## **11. PERSONAL DATA TREATMENT POLICY EXPIRATION DATE.**

This Policy may be unilaterally modified or updated by Fundación Arturo Sesana, Participants will be informed of such changes through the Site itself. Modifications to the Policy will automatically take effect once they are published on the Site. This Policy was last updated on July 3rd, 2024.