



Fundación
Filarmónica
de Santander

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PERSONAL DATA AND SENSITIVE DATA PROCESSING POLICY

Fundación Filarmónica de Santander

Version: 1.0

Effective Date: January 2, 2026

Approval: Minutes dated January 2, 2026

Last Updated: January 2, 2026

1. Identification of the Data Controller

Legal name: Fundación Filarmónica de Santander

Tax ID (NIT): 900543377

Registered office: Bucaramanga, Santander – Colombia

Address: Calle 86 # 25-68

Personal data contact email: contacto@filarmonicadesantander.com

Phone: 3176829092

Website: <https://filarmonicadesantander.com>

Fundación Filarmónica de Santander (hereinafter, the “Foundation”) acts as the Data Controller with respect to the personal data it collects and processes in connection with its programs, services, projects, educational and artistic activities, administrative operations, and institutional relations.

2. Purpose

To establish the institutional guidelines for the collection, storage, use, sharing, updating, rectification, and deletion of personal data, including sensitive data, ensuring the exercise of the

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right to data protection (habeas data) and compliance with the applicable Colombian personal data protection regime.

3. Scope

This Policy applies to personal data processed by the Foundation in relation to:

- Students, beneficiaries, alumni, and applicants.
- Parents, guardians, and caregivers.
- Teachers, trainers, artists, workshop facilitators, contractors, volunteers, and administrative staff.
- Donors, sponsors, institutional partners, supporters, suppliers, and contacts.
- Attendees of events, concerts, showcases, community activities, and the general public.
- Users of forms, digital channels, social networks, and the Foundation's website.

This Policy applies to physical and digital databases managed by the Foundation, as well as to third parties acting as Data Processors on behalf of the Foundation (technology platforms, storage providers, communications services, payment gateways, etc.), where there is a contractual or operational relationship limited to authorized purposes.

4. Definitions

- Personal data: information related to or capable of being associated with an identified or identifiable natural person.
- Sensitive data: information that affects the data subject's privacy or whose misuse may result in discrimination (e.g., health data, biometric data, ethnic origin, religious beliefs, among others).
- Data subject: the natural person to whom the data relates.
- Data Controller: the entity that decides on the database and the purposes/means of processing (the Foundation).
- Data Processor: an entity that processes data on behalf of the Data Controller.
- Processing: any operation performed on personal data (collection, use, storage, sharing, deletion, etc.).
- Authorization/Consent: prior, explicit, and informed consent of the data subject for the processing of their personal data.
- Privacy notice: oral or written communication informing the data subject about the existence of this Policy and how to access it.

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5. Applicable Principles

The Foundation applies, among others, the principles of lawfulness, purpose limitation, freedom (consent), accuracy/quality, transparency, restricted access and circulation, security, and confidentiality.

6. Categories of Data Processed

Depending on the nature of the Foundation's activities, it may process, by way of example:

- Identification and contact data: name, ID number, phone, email, address, age, etc.
 - Educational/training data: instrument/area, level, attendance, assessments, progress, pedagogical notes.
 - Administrative and contractual data: information for contracting, payments, accounting and tax supporting documents.
 - Image and voice data: photographs, videos, audio recordings of rehearsals, concerts, and institutional activities.
 - Sensitive data (where applicable): health-related information necessary for safety and support (e.g., allergies), specific support needs, among others, always with explicit consent and enhanced safeguards.
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7. Purposes of Processing

The Foundation processes personal data for the following purposes (non-exhaustive):

7.1 Mission-related purposes (education, culture, and community)

- Managing registration, admission, enrollment, retention, and graduation processes.
- Implementing and monitoring artistic training processes, rehearsals, ensemble practice, educational and artistic activities.
- Carrying out operational and academic communications with participants and guardians (schedules, changes, recommendations, reports).
- Managing artistic circulation activities: concerts, showcases, educational and community events.



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- Producing internal and institutional reports on coverage, participation, impact, and results.

7.2 Administrative, legal, and contractual purposes

- Managing relationships with teachers, workshop facilitators, artists, contractors, volunteers, and suppliers.
- Handling invoicing, payments, refunds, accounting control, and legal obligations.
- Responding to requests from competent authorities when there is a legal duty to do so.

7.3 Communications, outreach, and institutional relations

- Sharing information about the Foundation's programs, calls, concerts, events, campaigns, and news.
- Managing fundraising, donations, sponsorship/apadrinamiento, and partner relations.
- Documenting and disseminating institutional audiovisual content (photo/video) for educational purposes, institutional memory, and communications, in accordance with applicable authorizations.

7.4 Security and control (where applicable)

- Managing access control and reasonable protection of participants in in-person or virtual activities, in a proportionate manner and in compliance with the law.

8. Processing of Sensitive Data

The Foundation may process sensitive data only when:

1. It is strictly necessary for a legitimate purpose related to the Foundation's mission; and
2. The data subject (or their legal representative) has provided explicit authorization, except where legal exceptions apply.

Data subjects are not required to authorize the processing of sensitive data. Refusal will not prevent access to programs or services, unless the data is indispensable to ensure safety, minimum care, or compliance with an institutional duty.

The Foundation applies enhanced confidentiality and restricted-access measures for sensitive data.

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9. Processing of Data of Children and Adolescents (Minors)

Given the nature of its programs, the Foundation processes minors' data under enhanced protection standards:

- The best interests of minors and the protection of their fundamental rights will prevail.
 - Authorization will be granted by the legal representative (parent/guardian).
 - Data minimization, confidentiality, and restricted access will apply.
 - Where appropriate, the Foundation will seek the minor's assent, without prejudice to the guardian's authorization.
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10. Data Subject Authorization (Consent)

The Foundation will request prior, explicit, and informed authorization to process personal data, except where legal exceptions apply. Authorization may be obtained through:

- Physical or digital forms.
- Clauses in registrations, contracts, minutes, rules, and institutional documents.
- Verifiable electronic records.

Data subjects may revoke authorization and/or request deletion where applicable, provided there is no legal or contractual obligation requiring retention.

11. Data Subject Rights

Data subjects may exercise, among others, the following rights:

- To know, update, and rectify their personal data.
 - To request proof of the authorization granted.
 - To be informed about the use given to their data.
 - To submit inquiries and complaints.
 - To revoke authorization and/or request deletion where applicable.
 - To access their personal data free of charge under the terms set by law.
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12. Contact Channels and Procedure for Inquiries and Complaints

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12.1 Channels

Data subjects may exercise their rights through:

- Email: contacto@filarmonicadesantander.com
- Address: Calle 86 # 25-68, Bucaramanga, Santander – Colombia

12.2 Inquiries

The Foundation will address inquiries regarding the processing of personal data within the applicable legal timeframes. If it is not possible to respond within the legal term, the Foundation will inform the requester of the reasons and the date on which the inquiry will be answered.

12.3 Complaints

Complaints must include at least:

- Identification of the data subject (or the person acting on their behalf)
- A clear description of the facts giving rise to the complaint
- A physical or email address for notifications
- Supporting documents, where applicable

If the complaint is incomplete, the Foundation will request that it be completed. If it is not completed within the applicable terms, it will be deemed withdrawn. The Foundation will process the complaint in accordance with current legal timeframes.

13. The Foundation's Duties

As Data Controller, the Foundation undertakes to:

- Guarantee the full and effective exercise of data protection rights.
- Request and retain authorization when required.
- Inform the data subject about the purpose of collection and the rights available.
- Store information under appropriate security and confidentiality conditions.
- Update, rectify, or delete data when applicable.
- Process inquiries and complaints within legal timeframes.
- Require appropriate processing, confidentiality, and security standards from Data Processors.

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14. Data Transfers and Data Processing by Third Parties

The Foundation may:

- Share data with Data Processors that provide necessary operational services (forms platforms, email services, storage, CRM, payment gateways, etc.), ensuring processing is limited to authorized purposes.
- Transfer data to third parties only where the data subject has authorized it, where there is a legal obligation, or where permitted by law.

Where third parties are involved, the Foundation will seek to implement agreements and safeguards consistent with the nature of the data and the associated risk.

15. Processing of Images, Videos, and Audiovisual Materials

The Foundation may capture and use images, videos, and voice recordings within institutional activities (rehearsals, concerts, events, classes, and community activities) for educational purposes, institutional memory, and communications.

Where required, the Foundation will obtain authorization for the use of image and voice, particularly for minors, in accordance with institutional forms and the purposes communicated.

16. Information Security Measures

The Foundation implements reasonable and proportionate measures to protect data, including:

- Access controls based on roles and “need to know.”
 - Proper custody and archiving of physical documents.
 - Good password practices and secure access to institutional tools.
 - Backups and controls for digital storage.
 - Confidentiality commitments with staff, contractors, and third parties.
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17. Data Retention



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Personal data will be retained for the time necessary to fulfill the purposes described herein and/or for the periods required by law, contractual obligations, accounting, tax, or institutional oversight requirements. Once the purposes and legal retention periods have been met, data will be deleted or anonymized where applicable.

18. Validity and Amendments

This Policy is effective as of January 2, 2026.

The Foundation may amend this Policy at any time due to regulatory, institutional, or operational changes. Updates will be communicated through institutional channels and/or published on the Foundation's website at <https://filarmonicadesantander.com>.

ANNEX 1 – PRIVACY NOTICE (for forms)

PRIVACY NOTICE – Fundación Filarmónica de Santander

Fundación Filarmónica de Santander, as Data Controller, informs that the personal data provided will be processed to manage registrations, educational and artistic activities, institutional communications, event logistics, partner relations, and administrative obligations. The data subject may exercise their rights to access, update, rectify, and request deletion or revocation by writing to contacto@filarmonicadesantander.com or submitting a request at Calle 86 # 25-68, Bucaramanga, Santander. By completing this form, the data subject (or their legal representative) authorizes processing in accordance with this Policy, available at <https://filarmonicadesantander.com>.

ANNEX 2 – AUTHORIZATION CLAUSE (template for registrations/contracts)

I, identified as indicated at the end of this document, as the data subject (or as the legal representative of the minor), hereby grant prior, explicit, and informed authorization to Fundación Filarmónica de Santander (Tax ID/NIT 900543377) to process my personal data (and/or the data of the minor under my care), in accordance with the purposes described in this Personal Data and

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Sensitive Data Processing Policy. I acknowledge that I may exercise my rights of access, update, rectification, deletion, and revocation by writing to contacto@filarmonicadesantander.com.

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