

# PRIVACY AND PERSONAL DATA PROTECTION POLICY

Controller: Fundación Edad Primavera (FEPRIM) — Non-Profit Organization (ESAL)

NIT: 902.072.076-1 · Domicile: Carrera 8A #37A-62, Barrio Gaitán, Ibagué, Tolima, Colombia

Habeas Data Contact: [info@fundacionedadprimaveral.org](mailto:info@fundacionedadprimaveral.org) · +57 317 114 1858

In force: from its official publication on the web portal (2026) · Version 1.1 — Annual review scheduled

## 1. LEGAL FRAMEWORK AND REGULATORY BASIS

This Policy is issued in compliance with Article 15 of the Political Constitution of Colombia, Statutory Law 1581 of 2012, Regulatory Decree 1377 of 2013 (incorporated into Sole Regulatory Decree 1074 of 2015), the guidelines of the Superintendence of Industry and Commerce (SIC), and any other norms that complement, amend, or replace them.

Its purpose is to guarantee the constitutional right of every individual to know, update, rectify, and suppress information collected about them in FEPRIM's databases, as well as the right to file complaints with the competent supervisory authority.

## 2. DATA CONTROLLER

The data controller is **FUNDACIÓN EDAD PRIMAVERAL (FEPRIM)**, a Non-Profit Organization (ESAL) legally incorporated before the Ibagué Chamber of Commerce under Deed No. 001 (2026).

To exercise Habeas Data rights, data subjects may contact FEPRIM through:

- Email: [info@fundacionedadprimaveral.org](mailto:info@fundacionedadprimaveral.org)
- Corporate WhatsApp Business: +57 317 114 1858
- Physical address: Carrera 8A #37A-62, Barrio Gaitán, Ibagué, Tolima (Mon–Sat, 8:00 AM – 5:00 PM)

## 3. DATA COLLECTED AND PURPOSE OF PROCESSING

FEPRIM collects data from the following categories of data subjects:

- **Monetary and in-kind donors:**

Process and validate transactions via Wompi, ePayco, and PayPal. Issue donation and tax-deduction certificates (Art. 257 Tax Code). Send periodic financial transparency reports and fund allocation updates.

- **Portal users / Reciprocity Strategy:**

Manage delivery of requested digital resources (Practical Guide: 10 warning signs). Execute email nurturing campaigns with express consent.

- **Volunteers and institutional partners:**

Coordinate brigades, therapeutic garden activities, and intergenerational programs. Manage alliances with the Universidad del Tolima, Cruz Roja Tolima, and other entities.

- **General — all data subjects:**

Handle inquiries, complaints, claims, and suggestions (PQRS). Optimize user behavior metrics via Google Analytics 4 and Google Tag Manager.

## 4. SENSITIVE DATA AND SPECIAL PROTECTION

FEPRIM acknowledges that data related to the health status, medical records, and sociodemographic vulnerability conditions of elderly beneficiaries and their families constitutes **Sensitive Data** under Article 5 of Law 1581/2012. Its collection shall always be optional and require explicit authorization from the data subject or, in cases of incapacity, from

their guardian or legal representative. FEPRIM commits to:

- Not use sensationalist or paternalistic language when communicating individual cases.
- Obtain express written consent before publishing audiovisual material or storytelling involving a resident.
- Guarantee the dignity, identity, and privacy of elderly individuals at all times.

## 5. RIGHTS OF DATA SUBJECTS (ART. 8, LAW 1581 OF 2012)

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Every data subject whose personal data is processed by FEPRIM has the right to:

- Know, update, and rectify their personal data.
- Request proof of the authorization granted to FEPRIM for processing.
- Be informed, upon request, of the use given to their data.
- File complaints with the Superintendence of Industry and Commerce (SIC).
- Revoke authorization and/or request deletion of data when constitutional rights are not respected.
- Access, free of charge, their personal data under processing.

## 6. PROCEDURE FOR EXERCISING RIGHTS (HABEAS DATA)

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Data subjects or their heirs may exercise their rights free of charge through the channels indicated in Section 2.

- **Inquiries:**

Addressed within a maximum of ten (10) business days from receipt. If not possible within that period, the interested party will be notified before the deadline, indicating the date of resolution (max. 5 additional days).

- **Claims (correction, deletion, or update):**

Resolved within a maximum of fifteen (15) business days. If the claim is incomplete, the data subject will be asked to remedy it within the following 5 business days.

- **Revocation of consent:**

The data subject may revoke authorization at any time, unless processing is necessary for the fulfillment of a legal or contractual obligation.

## 7. COOKIES AND TRACKING TECHNOLOGIES

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FEPRIM's web portal uses cookies and tracking technologies via Google Analytics 4 (GA4) and Google Tag Manager (GTM) to analyze visitor behavior, measure donation conversions, and optimize user experience. Collected data is anonymous and statistical; it does not personally identify the user unless they have completed a form.

Users may manage, limit, or disable cookies through their browser settings. Disabling analytical cookies does not prevent access to the portal or the completion of donations. FEPRIM does not use third-party advertising cookies or share browsing data with external advertisers.

## 8. INTERNATIONAL DATA TRANSFER

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Since FEPRIM uses tools whose infrastructure is located outside Colombian territory — including Google Analytics 4 (US servers), PayPal (international processing), and email services under Google Workspace — international data transfers occur.

Such transfers are made only to countries, entities, or platforms that provide adequate protection guarantees, pursuant to Article 26 of Law 1581/2012. By accepting this policy and using the portal, the data subject grants express consent to these transfers. FEPRIM subscribes, where applicable, to the data processing agreements required by each technology provider.

## 9. DATA RETENTION PERIODS

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Personal data will be retained for the following periods:

- **Donor data:**

Minimum 5 years from the donation date, due to tax and audit obligations (DIAN).

- **Web users / lead magnet:**

Until the data subject revokes consent or requests deletion.

- **Volunteers and partners:**

During the term of the relationship and for 2 additional years for certification purposes.

- **Sensitive data of beneficiaries:**

As defined by applicable health regulations and for the duration of care services.

After these periods, data will be securely deleted or anonymized for statistical purposes, unless a legal obligation requires longer retention.

## 10. INFORMATION SECURITY

FEPRIM adopts the necessary technical, human, and administrative measures to protect records against alteration, loss, unauthorized consultation, or access:

- Mandatory SSL certificate on the entire web portal (end-to-end encryption).
- Encryption of all data capture forms.
- Storage under scalable infrastructure (Firebase / Google Cloud) with automatic daily backups.
- Restricted data access by authorized FEPRIM personnel, with identity controls and access logs.

In the event of a security incident affecting personal data, FEPRIM will notify the SIC and affected parties as promptly as possible, in accordance with the protocols established by the data protection authority.

## 11. VALIDITY AND AMENDMENTS

This Policy takes effect upon its official publication at [www.fundacionedadprimaveral.org/privacy-policy](http://www.fundacionedadprimaveral.org/privacy-policy). FEPRIM reserves the right to modify it to adapt to regulatory, jurisprudential, or institutional changes.

Material changes will be communicated at least 15 calendar days in advance through regular digital channels (email to registered data subjects and a prominent notice on the portal). Continued use of the portal after publication of changes will constitute acceptance of the updated policy.

**By completing any form on FEPRIM's web portal, the data subject confirms having read, understood, and accepted this Privacy and Personal Data Protection Policy. To exercise your rights or revoke consent, write to [info@fundacionedadprimaveral.org](mailto:info@fundacionedadprimaveral.org).**

Law 1581/2012 · Decree 1377/2013 · Art. 15 C.P.C. · WCAG 2.1 AA · Google for Nonprofits · SARLAFT · SSL 256-bits · Version 1.1 · 2026

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