

PERSONAL DATA PROTECTION POLICY

CHILDREN INTERNATIONAL FOUNDATION ECUADOR

1. INTRODUCTION AND PURPOSE

In accordance with the Constitution of the Republic of Ecuador and considering the fundamental right to data protection and privacy, CHILDREN INTERNATIONAL has developed this Personal Data Protection Policy.

This Policy aims to comply with the legal provisions of Ecuador, particularly those established in the Organic Law on the Protection of Personal Data (hereinafter, "LOPDP"), as well as its Regulations and secondary procedures, guaranteeing the protection of the personal data of all persons linked to its activities, with special emphasis on the data of Ecuadorian children and adolescents who are beneficiaries of its protection, employability and professional training programs.

Likewise, this Policy regulates the international transfer of personal data from the Foundation in Ecuador to its head office based in the United States of America, in compliance with the provisions on international transfer provided for in the LOPDP and its complementary regulations.

2. IDENTIFICATION OF THE DATA CONTROLLER

CHILDREN INTERNATIONAL is a non-profit organization properly authorized under Ecuadorian law, with its headquarters in Quito, Ecuador.

We inform you that we possess and collect only personal data strictly necessary for the purposes outlined in this Personal Data Protection Policy, which is stored in CHILDREN INTERNATIONAL's databases.

If you do not provide your personal data, the contractual or beneficiary relationship between the parties cannot be established.

Your personal data may have been obtained directly from you, either in person or through any electronic, optical, audio, visual, and/or other means (mail, internet, or telephone). Your personal data may also have been obtained indirectly, that is, through a publicly accessible source or from third parties (data transfer), and from other sources permitted by law.

3. SCOPE

This Policy applies to:

- All Foundation personnel, including employees, volunteers, interns, consultants, and contractors who have access to personal data.
- All personal data collected, stored, processed, transferred, or deleted by the Foundation in the course of its activities in Ecuador.
- Personal data of children, adolescents, and young adults who are beneficiaries of the Foundation's programs.

- Personal data of the legal representatives, parents, or guardians of these children, adolescents, and young adults.
- Personal data of adolescents or young adults participating in employability and vocational training programs.
- Data of employees, contractors, donors, and any other individuals whose data is processed by the Foundation.
- International transfers of personal data to the head office in the United States.

4. TERMS AND DEFINITIONS

TERM	DEFINITION
LODPD	Organic Law on the Protection of Personal Data published in the Official Registry, Supplement 459 of May 26, 2021.
Data Controller	CHILDREN INTERNATIONAL determines the purpose and means for the processing of personal data.
Holder	Natural person whose data is being processed.
Data Protection Officer	The Data Protection Officer or Data Protection Representative identified and assigned by CHILDREN INTERNATIONAL, acting under its instructions.
Treatment Activity	Any operation or set of operations performed on personal data or sets of personal data.
Impact on data protection	Violation of personal data (security breach) such as accidental or unlawful destruction, loss or alteration of information.
Personal data	Data that identifies or makes identifiable a natural person, directly or indirectly.
Credit details	Data that integrates the economic behavior of natural people, to analyze their financial capacity
Sensitive data	Data relating to ethnicity, gender identity, cultural identity, religion, ideology, political affiliation, criminal record, immigration status, sexual orientation, health, biometric data, genetic data and those whose improper processing may give rise to discrimination.
NNAJ	Children, adolescents and young people
Service Provider / Data controller	Any natural or legal person, public authority, agency or other institution that provides services to CHILDREN INTERNATIONAL in relation to the processing of personal data.
Beneficiary	Ecuadorian child, adolescent or young person enrolled in the Foundation's programs.
Staff member	Natural person who provides a service to CHILDREN INTERNATIONAL under an employment contract.
Applicant	Natural person who submits their resume in order to be considered in the selection processes managed by the Foundation.
International Transfer	Communication of personal data outside of Ecuadorian territory to a recipient in another country.
SPDP	Superintendency of Personal Data Protection of Ecuador.
Consent	Expression of free, specific, informed and unambiguous will of the holder.

5. CATEGORIES OF PERSONAL DATA PROCESSED

Personal data may be obtained directly from you (physically or electronically), or indirectly through authorized third parties. The data collected includes:

5.1. Data of beneficiary children

- Identifying data: names, surnames, date and place of birth, ID number or identity document, nationality, photograph.
- Contact information for the legal representative: address, telephone number, email address.
- Health information: relevant medical history, allergies, special health conditions, disabilities.
- Socioeconomic information: family composition, vulnerability status, housing conditions.
- Educational information: educational institution, academic level, academic performance.
- Program monitoring information: program progress, evaluations, monitoring reports.

5.2. Data on adolescents and young people in employability and training programs

- All data specified in section 5.1.
- Professional training data: area of training, certifications, acquired skills, performance evaluations.
- Employability data: work experience, skills developed, vocational profiles.
- Psychological and social support data: support reports, psychosocial assessments.

5.3. Information on legal representatives, parents or guardians

- Identifying information: first and last names, national identity card number, nationality.
- Contact information: address, telephone number, email address.
- Socioeconomic information: income level, employment status, family composition.
- Relationship to the child or adolescent: kinship or status as legal representative.

5.4. Employees, volunteers and collaborators data

- Identification and contact information.
- Employment information: position, responsibilities, professional history.
- Financial information for payroll processing.
- Criminal record certificates (mandatory requirement for working with children and adolescents).

6. PURPOSES OF THE PROCESSING OF PERSONAL DATA

CHILDREN INTERNATIONAL will process the personal data collected solely for the purposes described below, which are directly related to the Foundation's institutional mission and the services it provides to its beneficiaries. Under no circumstances will personal data be used for purposes other than those stated herein, unless there is express consent from the data subject or their legal representative, or there is a legal obligation to do so.

6.1. Purposes regarding children, adolescents and young beneficiaries

- Program Enrollment and Registration: Manage the admission, enrollment, identification, and registration process for children and adolescents as beneficiaries of the Foundation's programs.
- Provision of Comprehensive Protection Services: Provide care and protection services to children and adolescents, including psychosocial support, access to healthcare, nutrition, education, and holistic development.
- Monitoring and Evaluation of Progress: Monitor the individual progress of each beneficiary within the programs, prepare progress reports, and evaluate the achievement of program objectives.
- Health and Emergency Care: Manage health data to ensure appropriate medical care, respond to emergencies, and coordinate with health institutions when necessary to protect the life or well-being of the child or adolescent.
- Communication with Legal Representatives: Hold contact with parents, guardians, or legal representatives of the children or adolescents to inform them about progress, activities, calls, and any other relevant program information.
- Sponsorship Management: Facilitate sponsorship relationships with donors, sharing limited and previously authorized information about the beneficiary, always safeguarding their identity and dignity.

6.2. Purposes regarding adolescents and young people in employability and vocational training programs

- Training and education: Design, implement and evaluate technical, professional and life skills training programs, adapted to the needs and abilities of each adolescent.
- Vocational and employment counseling: Developing vocational profiles, providing professional guidance and supporting adolescents in building their working life project.
- Link to employment opportunities: Connecting adolescents with companies, institutions, and opportunities for work placements, internships, or employment, in accordance with labor laws for minors.
- Skills certification: Managing the issuance of certificates of participation, training completion, and recognition of acquired skills.
- Psychosocial support: Providing psychological and social support to adolescents during their training and job placement process.
- Impact measurement: Evaluating the effectiveness of employability and training programs through outcome indicators and their impact on the lives of adolescents.

6.3. Purposes concerning legal representatives, parents or guardians

- Verification of identity and legal representation: Confirm the identity and legal representative status of the child or adolescent for consent and communication purposes.
- Socioeconomic assessment: Determine the vulnerability of the family unit to target services and allocate benefits.
- Institutional communication: Inform about program development, activities, calls, results, and any other relevant information about the beneficiary.
- Compliance with legal obligations: Respond to requests from competent authorities regarding child and adolescent protection.

6.4. Purposes regarding employees, volunteers and collaborators

- **Employment Relationship Management:** Manage the hiring, performance, and termination of employment or contractual relationships, including the payment of wages, social benefits, and tax obligations.
- **Selection Processes:** Evaluate resumes, verify references and criminal records, and manage the hiring process.
- **Protection of Children and Adolescents:** Verify criminal records and carry out the necessary procedures to ensure that all personnel working with children and adolescents meet the suitability requirements established by law.
- **Training and Development:** Manage staff participation in training and professional development programs.
- **Occupational Health and Safety:** Comply with legal obligations regarding workplace risk prevention.

6.5. Transversal purposes

- **Accountability:** Prepare reports for donors, cooperation agencies, control institutions, and the main office in the United States, preferably using aggregated or anonymized data.
- **Research and Statistics:** Conduct studies, analyses, and research on the situation of children and adolescents in Ecuador, using anonymized or pseudonymized data that does not allow for the identification of data subjects.
- **Continuous Program Improvement:** Analyze program results to optimize their design, implementation, and reach.
- **Regulatory Compliance:** Respond to requests from administrative, judicial, or oversight authorities, in accordance with Ecuadorian law.
- **Administrative and Financial Management:** Manage the Foundation's resources, handle contracts with suppliers, coordinate program logistics, and comply with accounting and tax obligations.
- **International Data Transfer:** Transfer personal data to the parent organization in the United States for program coordination, monitoring, evaluation, and accountability purposes.

7. LEGAL BASIS FOR PROCESSING

In accordance with Article 7 of the LOPDP, the Foundation processes personal data under the following legal bases:

7.1. Consent

Consent will be freely given, specific, informed, and unambiguous. For the processing of data concerning children and adolescents, consent will be given by their legal representative, in accordance with Article 24 of the LOPDP and the Code for Children and Adolescents. The Foundation will implement separate consent forms depending on the type of data and the purpose of the processing.

7.2. Legitimate interest

The processing may be based on the legitimate interest of the Foundation for the fulfillment of its institutional mission, provided that the fundamental rights and freedoms of the data subjects do not prevail, especially when it comes to data of children and adolescents.

7.3. Vital interest of the holder

When necessary to protect the vital interests of the child or other person, particularly in emergencies or risk situations.

7.4. Compliance with legal obligations

When the treatment is necessary to comply with legal obligations to which the Foundation is subject, such as reports to child protection entities or competent authorities.

8. ENHANCED PROTECTION OF DATA FOR CHILDREN, ADOLESCENTS AND YOUNG PEOPLE

Acknowledging that data concerning children and adolescents constitutes special category data requiring enhanced protection under the LOPDP, the Foundation establishes the following additional measures:

- Consent for the processing of data concerning children and adolescents will be granted exclusively by their duly authorized legal representatives, in accordance with the Civil Code and the Code for Children and Adolescents.
- Legal representatives will be provided with clear, complete, and understandable information regarding the data collected, its purposes, recipients, and the existence of international data transfers.
- Adolescents participating in training and employability programs will receive age-appropriate information about the processing of their data.
- The principle of the best interests of the child will be applied as the guiding criterion in all decisions regarding the processing of data concerning children and adolescents.
- Access to data concerning children and adolescents will be restricted exclusively to authorized personnel who require it to perform their duties.
- The use of children and adolescents' data for marketing purposes, commercial profiling, or any purpose unrelated to the Foundation's mission is expressly prohibited.
- The Foundation will implement enhanced technical and organizational measures to protect databases containing information on children and adolescents.
- In accordance with Article 24 of the LOPDP (Organic Law on the Protection of Personal Data Held by Private Parties), the Foundation will provide information and training on the responsible and secure use of children's and adolescents' personal data to both data subjects and their legal representatives.

9. RIGHTS OF PERSONAL DATA SUBJECTS

Subject to the provisions of the LOPDP, the data subject or their legal representative may exercise their data protection rights at any time. They may also revoke their consent.

- Exercising these rights is completely free of charge.
- To exercise them, you must send your written request to the email address **delegadoprotecciondatos@qto.children.org.ec**.
- The request will be processed within a maximum of fifteen (15) business days, as established by the LOPDP (Organic Law on the Protection of Personal Data).

10. INTERNATIONAL TRANSFER OF PERSONAL DATA

The Foundation, as part of an international organization headquartered in the United States of America, makes international transfers of personal data for the fulfillment of its institutional purposes, programmatic coordination, accountability and results monitoring.

10.1. Purposes of the international transfer

The transfer of personal data to the parent organization in the United States will be carried out exclusively for the following purposes:

- Coordination and programmatic management of services provided to beneficiaries.
- Monitoring, evaluation, and reporting of program impact.
- Accountability to donors and international cooperation agencies.
- Centralized administrative and financial management.
- Technical and technological support for information systems.

10.2. Protection mechanisms for the transfer

In accordance with the LOPDP, its Regulations and the General Transfer Standard (Resolution SPDP-SPD-2026-0004-R), the Foundation will implement the following mechanisms:

- Adequate safeguards: Standard contractual clauses approved by the SPDP will be signed, or, failing that, binding corporate rules that guarantee a level of protection equivalent to or greater than that established by Ecuadorian law.
- Specific consent: The prior, freely given, specific, informed, and unambiguous consent of the data subject (or their legal representative in the case of children and adolescents) will be obtained for the international transfer of their data.
- Information to the data subject: Data subjects will be informed about the destination country (United States), the identity of the recipient (head office), the purposes of the transfer, the safeguards implemented, and the applicable protection mechanisms.
- Minimization of transferred data: Only the data strictly necessary for the stated purposes will be transferred. Where possible, anonymized or pseudonymized data will be transferred.
- Encryption and Security: All international transfers will be conducted through encrypted and secure channels, complying with international information security standards.

- **Recipient Obligations:** The head office will be contractually obligated to comply with the Ecuadorian Data Protection Law (LOPD), its Regulations, and other applicable legislation, and will submit to the jurisdiction of the Ecuadorian Data Protection Superintendency (SPDP) and the Ecuadorian courts regarding data protection matters.

11. VALIDITY AND UPDATING

This Policy will take effect upon its approval by the Foundation's Executive Board and will be reviewed and updated at least annually, or whenever regulatory, operational, or technological changes so require.

Any modifications to this Policy will be communicated to Foundation staff and, where applicable, to the subjects of data.

12. APPROVAL