

Personal Data - Privacy Policy (Park Lane International School)

Introduction

We take the protection of your personal data very seriously and strictly observe the appropriate laws and regulations. We would like to take this opportunity to inform you about the steps taken by Park Lane International School to ensure the protection of your data as well as how your data may be processed and the purpose of doing so. The legal framework is set by the European Union ("EU") General Data Protection Regulation ("GDPR") no. 679 / 2016.

Park Lane International School ("PLIS") processes personal data on its prospective, current and former students, their parents or legal guardians, its staff and service providers ("data subjects") as a part of its everyday operations of providing educational services. For these purposes, PLIS acts as controller with regard to the data of data subjects ("Personal Data"), meaning PLIS establishes the purposes and means of processing the Personal Data.

Personal Data is data that the School holds about the data subjects (listed but not limited to above) which identifies them. The School needs to know the basic personal data of the data subjects (such as but not limited to contact details, dates of birth, languages, gender, diplomas achieved, and criminal background checks) and students (including names, addresses, dates of birth, languages, academic progress, examination results, behaviour records and learning needs). This could also mean recording and processing special categories of personal data such as medical data. CCTV, photos and video recordings are also personal data (all together, the "Personal Data").

This notice applies to all Personal Data collected for or on behalf of the School whether in analogue form (documents and forms in writing) or in digital form (such as information systems, databases and e-mails).

For the purposes of this Privacy Policy, please note that the term "processing" shall represent any operation performed on Personal Data, whether or not by automated means such as collection, recording, storage, adaptation, alteration, consultation, use, disclosure by any means, erasure or destruction.

PLIS wishes to be completely transparent with regard to the processing of Personal Data and therefore, we have presented below all the information you may need on this subject matter.

The purposes for which PLIS processes your Personal Data

PLIS collects personal data, including special categories of personal data of students and parents to provide a safe and caring international environment for teaching, learning and general educational purposes.

More specifically we process your or your children's personal data for the following purposes, and other purposes that are compatible with the purposes described below:

- **Provision of educational services**, starting with the application and admission processes, enrolling students, administration of classes and timetable, teaching activities, administration of internal and public examinations, assistance regarding the application process to various universities, issuance of academic records.
- **Provision of educational ancillary services**: career and personal counselling, library services, extracurricular activities, school trips, lunch and transport services, managing school's publications, setting up the virtual learning environment and granting access to PLIS's Parent Portal, Intranet and Internet network as well as monitoring the use of PLIS's network.
- **Ensuring campus security**: monitoring access on campus, performance of video surveillance.
- Provision of **the medical care, learning support and counselling** that students may need.
- **School administration**: handling student records and other academic documentation, administration of fees and accounts, internal audits and controls, reporting and statistics creation, implementing school policies, ensuring collaboration with other schools, archiving, assessing the quality of our services, facilitating research activities.
- **School related communications** (e.g. PLIS newsletters and direct emails): conveying various messages related to the students and PLIS's activities by any communication means.
- Organizing **fundraising activities** and other school events (e.g., concerts, theatre productions, festivals, ceremonies etc.), including marketing communications related to the fundraising activities organized by PLIS.
- Dispute resolution and litigations.

The categories of Personal Data that PLIS processes, include, but are not limited to the following:

- **Identification and contact information** (first and last name, date of birth, nationality, languages, address, phone number, email etc.); bank details, school photos;
- **Health data**: medical history, allergies, diet, immunization records, disorders, medical examination results, health insurance details and other medical data of the students;
- Data related to **the educational background** and regarding **school performance of the students**: report cards plus any other academic, disciplinary or educational related records, academic references, special educational needs, developmental delays, co-curricular activities, results of educational diagnosis testing, test results, feedback, evaluations etc.;
- **Behavioural data** as well as data on preferences / interests of students;
- **Family information**: household information, language background, profession and workplace of parents etc.;
- **Authentication and access data**: e-mail, passwords, other on-line identifiers etc.;
- **Special categories of personal data** (see more below): biometric data;
- **Photos and videos**.

Generally, the Personal Data held by PLIS were provided directly by the parents or resulted from the interaction the parents and the students have with the school. In some cases, third parties (e.g., representatives of former schools attended by students) supply data.

The lawful basis for the processing operations we conduct with regard to the Personal Data

PLIS collects and further processes Personal Data, based on one of the following legal grounds, expressly laid down by the GDPR:

- For the **performance of the enrolment contract**, as well as in order to take steps at your request for entering into the enrolment contract and to further provide the educational services.
- The **consent** you have granted us, prior to any processing of the personal data, for:
 - the use of students' photographs and videos in various school publications, on PLIS's website and social media pages;
 - the use of your contact details for direct marketing communications on PLIS's fundraising and other activities;
 - other consents that may be granted from time to time for various processing activities.

Please note that there are some mandatory categories of personal data necessary to PLIS in order to conclude the enrolment agreement and provide the educational services to students at a high standard and in the best interest of the students.

The mandatory categories of personal data are included in the application form, which you have filled in either on-line or in writing and listed in the enrolment contract you already have/will sign with PLIS. All the categories of data that are compulsory for contract conclusion are marked accordingly in the application form.

Please take into consideration that all the mandatory categories of data are necessary for PLIS to be able to evaluate your application and finally to enrol your child. Failure to provide all the information marked as mandatory will lead to the impossibility of PLIS being able to process your application and to enter into a contract with you.

- A **legal obligation** that requires PLIS to process your Personal Data (e.g. performance of video surveillance).
- For the **performance of a task carried out in the public interest**, considering that PLIS provides educational services, regarded as a service of public interest, according to the Dutch applicable provisions on education, many processing operations conducted by PLIS that are strictly related to educational purposes will be founded on this lawful basis for processing. We refer here mainly to issuing and storing academic records, evaluating students' performance etc.
- The **legitimate interest pursued by PLIS**.

PLIS relies on this legal ground in order to provide the educational services it has committed to deliver and additional services related to this scope at the highest standards, always for the benefit of the students and without exceeding the parents or the students' rights and liberties.

PLIS may invoke the legitimate interest legal ground in the following cases:

- monitoring use of the PLIS's digital learning environment and network, including monitoring the use of e-mail accounts provided by PLIS;
- conducting fundraising activities, including marketing of such activities;
- satisfaction surveys;
- enforcement of legal claims, addressing complaints and third party controls;

- management, control, reporting and performing statistics on school activities;
- ensuring security;
- maintaining close relationships with alumni and PLIS's community;
- collaboration with other schools and educational institutions;
- performance of agreements with suppliers, including insurance suppliers;
- access to grants and other funding sources.

With respect to the processing of the **special categories of personal data** under the GDPR, respectively health data, please take into consideration that PLIS processes health data based on the following legal grounds:

- The necessity of the Medical Office to process such data for the purpose of preventive and occupational medicine, medical diagnosis and **the provision of health or social care or treatment** on the basis of European Union or national law;
- Processing is necessary for reasons of **substantial public interest**, on the basis of European Union or national law. Such a legal ground is used especially in those situations where the school has to assess the learning capacity of a student and adapt the teaching activities to the special needs of a student.
- The **explicit consent** granted by you for the disclosure of the personal data of students related to the allergies they suffer from.

The education services we provide require us to collect and process special categories of data, such as health information, for the purposes of safeguarding, protection of your children and the wellbeing of those within our care. We do not disclose or share special categories of data without explicit and unambiguous consent unless we have to do so where we are required to by law, or where we have good reason in protecting the vital interests of an individual, or where not doing so would place someone else at risk.

Disclosure of Personal Data

PLIS discloses your Personal Data only to those members of PLIS, staff and collaborators, who need access to the personal data mainly for ensuring the provision of the educational and ancillary services. In this respect, please take into account that only the Medical Office has access to the students' medical records. Other departments of the school have access to specific health data based on the consent you have expressed (i.e. for allergies) or in order to protect a substantial public interest based on E.U. or national law (e.g., various medical conditions triggering special learning needs).

With respect to the disclosure of your Personal Data to third parties, outside PLIS, please note that such disclosure is performed solely in the regular activity of the school. The categories of recipients include the following:

- IT providers, including educational applications, on-line tools, server hosting suppliers such as MIS, Google Apps for Education etc.
- Meals provider in its capacity as independent provider of meal services on campus;
- Other educational institutions or organizations, not limited to other schools;
- Transportation providers and travel agencies;
- Security providers;
- PLIS's official school photographer and video crew;
- Printing and promotions companies, graphic studios;
- Courier services providers;

- Public authorities and institutions, national or foreign, judicial courts and foreign embassies or other forms of diplomatic missions;
- Tax, legal and accounting consultants;
- Social networks such as Facebook, Twitter, YouTube etc.

Publication of photos and videos by the school

Photos and videos are important media that significantly enhance communication about the School's programmes and activities to the PLIS community, prospective families, alumni, and the general public. For this reason, the School uses such media on its website, in its print publications, newsletters, and articles for external publications.

Furthermore, photos and video are also created for educational purposes by students and teachers and play an important role in the instructional programme.

As members of the PLIS community, parents, students, staff, service providers / suppliers, volunteers and interns may be filmed or photographed. These images may be used for both educational and promotional purposes. We are conscious and respectful of the privacy of all PLIS community members and therefore the publication of these images takes place under the following conditions:

PLIS Community

Publications destined for the PLIS community, including the password protected internet pages, School Yearbook and School newsletters: students, parents, staff, service providers / suppliers, volunteers and interns may be identified by name in images found in publications such as the PLIS Yearbook, weekly newsletters or other in-house documents. On the password protected portals, individuals may be identifiable by name. Images and video clips that appear on these pages may identify students, parents, staff, service providers / suppliers, volunteers and interns either directly or indirectly depending on their context. These pages are password protected and only available to members of the PLIS community.

Public

Publications destined for the general public, including the PLIS public website, School publications and articles: individuals will not be identified by name in photos or video clips without prior agreement. Students who take part in School productions such as plays, concerts, athletic tournaments or other events that are open to the general public and which are publicized outside the School may be identified by name in photos or video clips that are published by the School.

If such photographs and videos reveal any sensitive personal data of you or your child, we will only process and use such photographs and videos if and to the extent we have obtained you and/or your child's consent where required under applicable data protection legislation to do so. Please contact the Data Protection Coordinator if you have specific concerns about photos being published: privacy@parklane-is.com.

Third country transfers

Personal data may also be transferred to organisations outside the Czech Republic and outside the European Union. This may for example occur for the purposes of student application for college or university. Various teaching and learning applications of providers that are based outside the European Union are also used.

For such transfers of personal data outside the European Union, PLIS has implemented suitable safeguards in the form of standard contractual clauses where required under applicable data protection legislation. Where this is not the case the data is anonymised before transmission.

If you wish to consult the appropriate safeguards put in place by PLIS about the transfers of personal data to USA or other countries, please refer to the contact point at the end of this Privacy Policy.

Retention of Personal Data

PLIS holds all your Personal Data for as long as you are in a contractual relation with us, and afterwards for a standard period of the date of the student's graduation (or date of leaving the school) plus 5 years, the period for which PLIS can justify a need in storing such personal data. PLIS keeps the student file and all the data related to the student interaction with PLIS mainly for the scope of assessing the school's activity and the quality of services provided but also for addressing potential request of students with regard to their school trajectory within PLIS, which usually appear after the students have graduated.

Notwithstanding the retention period mentioned above, please be informed that all the academic records and other school acts and documents related to study activities are kept for a period of the student's date of birth plus 25 years according to the legal obligations that PLIS has in this respect. Moreover, in any case where a legal provision imposes a minimum retention period, PLIS will keep the Personal Data for at least that mandatory period.

Your rights related to the processing of Personal Data by PLIS

The GDPR provides certain rights related to the processing of personal data, that both you and the students have. In this respect, please be informed that students that have an appropriate level of understanding could exercise the rights listed in this section, individually.

PLIS respects all the rights mentioned under the GDPR and is committed to furnishing the appropriate means by which you can exercise these rights, according to the details mentioned below:

- **The right of access**, which entails your possibility to obtain the confirmation from PLIS whether your Personal Data is being processed by PLIS or not, and if the case may be you are entitled to solicit access to this data, as well as additional information regarding the Personal Data, such as: the purposes of processing, the categories of recipients the Personal Data are being disclosed to and the envisaged retention period. In the situations where you may need to exercise the right of access, please consider contacting PLIS and requesting confirmation by e-mail at privacy@parklane-is.com.

Please consider that there might be specific situations that are exempted from the right of access, such as information that identifies other individuals or which is subject to confidentiality obligations.

- **The right to rectification**, that allows you to request PLIS rectification of any inaccurate Personal Data that PLIS may hold, as well as to have your incomplete Personal Data to be completed.
- **The right to erasure** meaning that in the situations expressly regulated by law, you may request erasure of your personal data. Please take into account, that the cases where the law provides for the possibility of erasure of personal data amount to the situations where the processing is unlawful or where the processing is based on your consent, and you have withdrawn such consent.
- **The right to restriction of processing**, signifying your right to obtain restriction of processing your Personal Data from PLIS's part. Please bear in mind that this right can be exercised only in specific situations laid down by the GDPR such as when you challenge the accuracy of your Personal Data. During the period necessary for us to rectify your data, you may ask us to restrict the processing of your Personal Data.
- **The right to data portability** implying your right to receive the personal data in a structured, commonly used and machine-readable format and further to transmit such data to another controller. This right to data portability shall be applicable only to the personal data you have provided to us and where the processing is carried out by automated means based on your consent or for the performance of the contract you have concluded with PLIS.
- **The right to object** to the processing of your Personal Data by PLIS, on grounds relating to your particular situation. The right to object applies to the situations where PLIS relies on consent as legal basis for processing (e.g. using your e-mail address for conveying fundraising related messages).
- **The right to lodge a complaint** designates your right to challenge the manner in which PLIS performs processing of your Personal Data with the competent data protection authority.
- **The right to withdraw your consent** given for various processing operations, in cases where the consent represents the lawful basis for processing. In cases where you withdraw your consent to processing your Personal Data, please note that the processing will end from the moment the withdrawal takes place without any effect on the processing that took place prior such withdrawal.

Profiling

PLIS creates various profiles through automated means based on the Personal Data that pertain to students. Generally, such profiles are created via various applications used in the on-line education environment such as Renaissance Learning etc.

PLIS creates and uses such profiles to evaluate the performance of its students, to identify gaps in their development or to assess specific traits that characterize students' personality, preferences, and behaviour or professional inclinations.

Video Surveillance

PLIS has implemented a video surveillance system on some campuses, in order to ensure security of its students, staff and all the other persons that enter our premises. The security and wellbeing of our students is our primary concern and these video cameras allow us to offer real time protection.

Signs are posted on the entrances to the campus signaling that video surveillance is being used.

Contact Point

In the situation where you may wish to exercise any of the rights listed under point 7 of this Privacy Policy or to obtain additional information or clarifications on the subject of processing your Personal Data please contact PLIS, *via its appointed Data Protection Coordinator* – responsible for ensuring that PLIS complies with all the requirements of the GDPR.

E-mail address of PLIS's Data Protection Coordinator: privacy@parklane-is.com

This present Privacy Policy (last updated August 21, 2018) shall apply along with other policies / procedures adopted at PLIS.

Additional Information Collected Automatically

In some cases, this website may automatically (i.e., not via registration) collect information about you that is not personally identifiable. Examples of this type of information include the type of Internet browser you are using, the type of computer operating system you are using, the IP address of your computer, and the domain name of the website from which you linked to this site. This information is used solely to provide the school with overall statistics on website usage, and to evaluate generalized user demographics.

Information Placed Automatically on Your Computer – Cookies

When you view this website, some information may be stored on your computer. This information will be in the form of a "cookie" or similar file and will allow the website to tailor the experience to your interests and preferences. With most Internet browsers, cookies can be blocked or erased after visiting a website. Some aspects of this website may not function properly if your browser is set to block cookies.

Security

The school takes every precaution to protect users' information. When users submit sensitive information via this website, it is encrypted and remains secure during all stages of transmission.