



Data Protection Policy

Rationale

The Data Protection Act is the law that protects personal privacy and upholds individual's rights. It applies to anyone who handles or has access to people's personal data.

This policy is intended to ensure that personal information is dealt with properly and securely and in accordance with the Data Protection Act. It will apply to information regardless of the way it is used, recorded and stored and whether it is held in paper files or electronically.

Aims

- To ensure that data is processed fairly and lawfully.
- To ensure that personal data shall be obtained only for one or more specific or lawful purpose.
- To ensure that personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
- To ensure that personal data shall be accurate and where necessary kept up to date.
- To ensure that personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose.
- To ensure that personal data shall be processed in accordance with the rights of data subjects under Spanish and EU law.
- To ensure that appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Procedures

Data relating to Parents and Legal Guardians

A range of Parent Data, including identification, contact and bank account data, will be collected by the School for the following purposes:

- To provide the Students with the Services and enable payment/recovery of fees.
- To contact Parents and Guardians in connection with the provisions of the Services and the education (in the broad sense) of the Students.
- For administrative and invoicing purposes and in order to perform the contract between Parents/Guardians and the School.
- For limited social purposes relating to the School (inviting Parents and Guardians to social events organised by the School, etc).

The Parent Data may be transferred to third parties as follows:

- To the tax authorities where required by law and as otherwise required by applicable law.
- To other companies within the same group of companies (as defined by Article 42 of the Spanish Commercial Code) in order properly to provide the Services and to allow a full and efficient coordination of all the group entities.
- To banks, other financial institutions and recovery assistants in order to ensure payment/recovery of fees.

Data relating to Students ('Student Data')

A range of Student Data, including photographic, identification, contact, health, disability, academic and general data (age, place and date of birth, DNI/NIE/passport number, nationality, name and address of previous school), will be collected by the School for the following purposes:

- To provide the Students with the Services and to monitor and assess their academic, physical and social development whilst they are at the School.
- For administrative, payment collection and recovery purposes.
- For limited social purposes relating to the School (including school trips, sporting events, extra-curricular activities and former students meetings).
- To compile the School Year Book (Anuario) and Marketing materials.
- To publish limited information on the School's web site, including photograph and awards obtained.
- To allow access to the intranet and other IT facilities at the School.

The Student Data may be transferred to third parties as follows:

- Limited data (only the essential) may be passed to third parties for purposes related to the activities of the School (including for emergency purposes to medical organisations, for organisation of school trips, circulation of distribution lists).
- Department of Education of the region where the School is based, the State Ministry for Education, the Town Hall of the place where the School is based, the Department of Health of the region where the School is based, the Tax Authorities (Agencia Tributaria), the Social Security Authorities (Tesorería General de la Seguridad Social), applicable Examination Boards (Tribunales de Examen) and Universities as required by law.
- To the corresponding examining boards and universities, in order to allow Students to sit external examinations and apply for university places.
- To external catering providers for the purpose of providing catering services.
- To transport operators, in order to provide transport services.
- To school camp agents/organisers and sports clubs, where appropriate.
- To third parties who provide insurance, banking and legal services.
- To other companies within the same group of companies (as defined by Article 42 of the Spanish Commercial Code) in order properly to provide the Services and to allow a full and efficient coordination of all the group entities.
- To external service providers, which provide advice to the School on future studies, aptitude tests and the like.

All of the above must be conducted on a strictly need to know basis.

Additional Marketing and Image Protection Requirements

In addition to the information indicated above, the school may also take photographs/videos of the students while at School or whilst involved in school related activities off site. This may include video recordings of events such as Concerts, Sports Days, plays, performances or other educational events. All these contents may be used for display, marketing and publicity purposes, in the school's prospectus or in other printed publications that are produced, as well as on TV/Radio/Internet programs from reputable third parties and on the school website. The school may be visited by the media, to take photographs or film footage of an educational visit or high profile event. Students are often shown in these images, which may possibly appear in reputable local or national newspapers, or on televised news programmes, and/or on related web sites. Names should never be attributed to images of students when used externally, outside the school community.

All this additional information constitutes, under Spanish Data Protection Laws, personal information that shall be collected, processed and transferred only with the prior consent of parents/legal guardians. On enrolling a student at the School, parents/legal guardians are required to confirm or deny in writing authorisation of the aforementioned use of images and videos for internal and external use.

Photographs may also be taken of children by professional photographers and offered for sale to parents.

On top of the standard requirements of the School's policy, the following additional terms may apply:

- These additional consents are valid as long as the student remains at the school unless the legal guardian revokes the consent by means of a formal written communication to the Head of Administration of the School.
- The School will not re-use any photographs or recordings after a student leaves this school.

- If the School or third party uses photographs or videos of individual students externally, it will not use the name of the student in the accompanying text unless additional individual consent from the parent/legal guardian has been obtained.
- If the School or third party uses group/general photographs or videos including students externally, it will not use the name any student in the accompanying text or caption unless additional individual consent from the parent/legal guardian has been obtained.
- The School may use pictures of students and teachers that have been drawn by the students.
- The School will only use images of students who are suitably dressed, to reduce the risk of such images being used inappropriately.
- Photographs and videos taken by the School may be included in a database controlled by the School for the purposes identified above, to the extent consent has been obtained for such purposes. Parents/legal guardians may exercise their rights of access, rectification, cancellation and objection in the same manner as for the other standard personal information collected and processed by the School.

All this is understood only with exception and limitation of those uses or applications that could violate the right to honour the terms provided in Organic Law 1/85, of the 5th May, Civil Protection of the Right to Honour, Personal Intimacy and family and of Own Image.

Monitoring and Review

It is the responsibility of the Head of Administration to monitor the intake and output of data throughout all areas of the school for internal review purposes. This policy should be reviewed as standard a minimum of once every two years.

Date of implementation: September 2017

Date of last review: September 2017

Policy review date: September 2019