



# Admissions Privacy Notice

## B – School Administration Policies & Procedures

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### Admissions Process Privacy Notice

#### Introduction

The British School Al Khubairat (“BSAK” “us” “we” “our”) values the rights and freedoms of all people. This includes respecting your privacy and protecting your personal data. This Admissions Process Privacy Notice (“Notice”) describes how we collect and use (or “process”) your information during the admissions process. It also tells you how to contact us as well as outlining what rights you have with regard to your personal data that we collect during the admissions process. To understand how we process your and your child’s data after admission, please see our Parental Privacy Notice.

In accordance with our Data Protection Policy and our General Privacy Notice, we commit to updating this Notice from time to time to ensure that you are informed about how we process your personal data. You can find the latest version of this Privacy Notice on our website.

The Data Protection Management team is responsible for data protection and our Head of Admissions is responsible for overseeing this Policy. Contact details for the Data Protection Management Team can be found in our General Privacy Policy and Data Protection Policy.

#### Data protection terms

The term ‘personal data’ refers to any information which identifies a person or can be used to identify a data subject when used in conjunction with other information.

The term ‘data subject’ describes the person about whom the personal data relates.

The term ‘processing’ means any activity that is performed on Personal Data or Special Category Data. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, restriction, erasure, or destruction of data.

#### How do we obtain your information?

During our admissions process, we collect the personal data in large part directly from parents/guardians, however, we collect some personal data from the children’s previous school(s) (if applicable).

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## What personal data do we process about you?

The personal data we use during the admissions process takes different forms, including:

- Children’s personal identifiers and contact information (such as name and address);
- Parental personal identifiers and contact information (such as name, address, phone number and email address);
- Children’s date of birth;
- Children’s Nationality/identity card and passport information;
- Parents’/guardians’ employer information;
- Safeguarding/child protection information;
- Photographs;
- Parents’ Nationality/identity card and passport information;
- Children’s native language/level of English knowledge/other languages spoken;
- Information related to the year and the grade for which each child is applying;
- Attendance (such as sessions attended, number of absences, absence reasons and any previous school(s) attended);
- Assessment and attainment information;
- Behavioural information (such as exclusions and any relevant alternative provision put in place); and
- Information from previous teacher(s) references (if applicable) related to the children’s social and emotional development, language and mathematical skills or other skills related to previous educational courses.

As a school, from time to time we also need to process personal data which is designated as “sensitive” or “special category” personal data in order to facilitate our school operations and activities. Such data includes personal data regarding a data subject’s concerning:

- Information related to safeguarding/ child protection, as well as children’s health. For example learning needs, disabilities or specific diseases/allergies/food intolerances that require our assistance in terms of organisational facilities and/or our educational support. We will also collect data related to immunisations (vaccinations) when we are required by law to ask for this information.

## Why we collect and process student personal data

The personal data, including that of your children shall be processed by our school for the following purposes:

- To manage admissions enquiries submitted by email, phone call or web form
- To administrate drop-in sessions
- Granting access to our online admissions portal, OpenApply and management information system iSAMS.
- Making an evaluation of students' applications, performing all the related administrative activities required when receiving an admission;

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- Carrying out all the necessary organisational activities, including evaluating and placing students in different classes, and checking our capability to provide the necessary support to children and parents;
  - Verifying of the applicant's examination results, academic records and other information;
  - Preparing of the enrollment agreement;
  - Facilitating visits and tours to view the school;
  - Enabling school administration and operation after admissions;
  - Facilitating our aptitude testing and assessment process for applicants;
  - Ensuring compliance with school policies and legal requirements, such as to guarantee students equity in opportunities; and
  - Engaging in statistics and research

## What are our legal bases for processing your personal data?

The legal basis for processing data in relation to these purposes are:

- To fulfil a contract we have with applicants' parents, or because they have asked us to take specific steps before entering into a contract;
- Compliance with legal obligations;
- Consent;

In addition, concerning any special category data, our condition for processing such data is:

- The data subject has given explicit consent to the processing of those personal data for one or more specified purposes,

Where we process the personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please contact our Data Protection Management Team at [dataprotection@britishschool.sch.ae](mailto:dataprotection@britishschool.sch.ae)

## How do we use and protect your personal data?

We limit the access to personal data, retained in physical archives or IT systems and infrastructure, only to those individuals that strictly need to know personal information in order to provide students and parents with specific services, assistance and support. Personal data will be kept confidential and will be protected via appropriate technical and organisational measures to ensure the security of personal data, including policies around use of technology and devices, and access to school systems.

## Categories of recipients to whom the data may be communicated

In the course of school operations, we may transfer personal data (including special category personal data where appropriate) gathered during the admissions process with third parties. Specifically, we may share such data with:

- School Management Information System iSAMS
- The School's Nurses;
- The School's professional advisors; and
- Relevant authorities (if legally required to do so).

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We may also be required to share your personal data with other organisations for legal or statutory purposes, or where we have your consent to do so. Moreover, we share personal data on an as-needed basis with our third-party service providers (e.g. to our email service provider in the course of emailing you information).

These service providers process personal data on our behalf and under our instructions for the purposes described above.

We may transfer data to other countries but in doing so will rely on either the existence of adequacy agreements or upon standard contractual clauses as part of agreements with data processors.

We will not sell, distribute or lease your personal data to third parties unless we have your permission or are required by law to do so.

For more information on how we transfer data to other countries is available upon request by contacting our Data Management Team at [dataprotection@britishschool.sch.ae](mailto:dataprotection@britishschool.sch.ae)

Additionally, the School will provide information to each pupil/parent (which can include relevant personal data of the respective children) as necessary to facilitate school operations.

## **Profiling/automated decision making**

We will not use your personal data for decisions based solely on automated processing or profiling if the decision produces legal effects concerning you or significantly affects you, unless you gave your explicit consent for this processing.

## **What rights do you have over your personal data?**

Under data protection laws, you have the right to:

- Obtain access to, and copies of, the personal data that we hold about you (subject to legal exceptions);
- Correct the personal data we hold about you if it is incorrect;
- Require us to erase your personal data in certain circumstances;
- Require us to restrict our data processing activities in certain circumstances;
- Transfer personal data, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller;
- Object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights (including a right to object to receiving fundraising or communications, and to object to our profiling you for the purposes of fundraising or keeping in touch);
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

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Please note that these rights are not absolute, and we may be entitled or required to refuse requests where exceptions or exemptions apply. We will respond to any such written requests as soon as is reasonably practicable and in any event within a reasonable period.

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify us of any significant changes to important information, such as contact details, held about you.

## **How do we retain and protect your personal data?**

All personal data is securely stored in accordance with legal requirements and school policy. We retain personal data only for the legitimate purpose(s) for which the personal data was collected, relying on the legal basis as mentioned above, and only storing such data for as long as necessary to accomplish those purposes, or as required by law. After we no longer need to process a particular piece of personal data, it is securely destroyed in accordance with legal requirements.

Upon admission, data will be processed and retained according to the school's retention policy and schedule. For denied applications, we may retain data from the date of denial; for withdrawn applications we can retain data according to the school's retention policy from the date of withdrawal.

## **Contact us**

If you have any questions or concerns about how we are using your personal data, or if you would like to exercise any of your information rights for which we are the data controller, or if you'd like to lodge a complaint about our data practices, please contact the Data Protection Management Team us at [dataprotection@britishschool.sch.ae](mailto:dataprotection@britishschool.sch.ae). You also have the right to contact the UAE Data Office.