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General Privacy Notice

B – School Administration Policies & Procedures

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Table of Contents.

Introduction	3
What is Personal Data?	3
Information We Collect	3
How Do We Obtain Your Information?	4
How We Use Your Information	4
Retention	6
How We Share Your Information	6
What Is Our Legal Basis for Processing Your Personal Data?	7
Consent	7
Security of Your Information.	8
Your Rights.	8
Changes to this Policy.	9
Contact Us.	10

Introduction

At British School Al Khubairat we value the rights and freedoms of all people. This includes respecting your privacy and protecting your personal data. This privacy notice describes how we collect and use (or "process") your information. It also tells you how to contact us as well as outlining what rights you have with regard to your personal data.

This privacy policy (this "Policy") explains how personal information is collected, used, and disclosed by British School Al Khubairat (BSAK) (collectively, "British School Al Khubairat (BSAK)," "we," "our" or "us").

Our privacy notice should be read in conjunction with our other policies and terms and conditions, which make reference to personal data, which can be found in our Data Protection Policy.

BSAK maintains other privacy notices which provide further detail for parents, students and employees.

Our [Admissions Privacy Notice](#) outlines how we collect and process personal data through our admissions process, before your child is admitted to the school.

Our [Parental Privacy Notice](#) outlines our processing of parent and student personal data

Our [Employee Privacy Notice](#) describes how we process your personal data if you are a past, present or prospective employee of BSAK

Please read this notice carefully and, if you have questions regarding your personal data or its use, please contact the Data Protection Team by emailing dataprotection@britishschool.sch.ae

If you consider that your personal data is not being used appropriately in accordance with this policy, you may contact us at dataprotection@britishschool.sch.ae.

What is Personal Data?

The term 'personal data' refers to any information that identifies you 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 is about.

Information We Collect

We process personal data about visitors to our website; prospective, current and past students and their parents; prospective, current and past staff and contractors; donors and supporters; and other individuals connected with or visiting our school.

The personal data we process takes different forms:

- names, telephone numbers, e-mail addresses;
- IP addresses, device information location data, and website statistics and analytics;
- website cookies (see Website Cookie Notice);
- students' and parents' date of birth, nationality, family details;
- students' and parents' passport and/or visa information
- admissions, academic, disciplinary and other education-related records, attendance data, references, examination scripts and marks;
- parents' employment data;
- images including photographs, audio and video recordings;
- financial information and identification documents (e.g. for bursary assessment or fee payment. for fundraising);
- employee and former employee data including recruitment, training, performance information, employment and training history, payroll, and other HR information.
- criminal records (*considered special category or sensitive in some jurisdictions)
- CCTV footage

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 concerning:

- health;
- special education needs;
- biometric data for staff (e.g. fingerprints)
- information relating to safeguarding and child protection/welfare
- race ethnicity; or
- religion.

How Do We Obtain Your Information?

We collect most of the personal data we process directly from the data subject concerned (or often in the case of students, from their parents). In some cases, we collect data from third parties (for example, referees/references, and previous schools) or from publicly available resources.

We also collect data about you when:

- you have expressed an interest in having a student attend our school;
- you have registered to attend (or have attended) one of our events;
- you visit our website;
- you sign up to receive our email and/or newsletter and/or prospectus;
- you have expressed an interest in working for, or with, us; or
- you are employed by us or an organisation with whom we have a business relationship.

How We Use Your Information

We may use your personal data for the following purposes ("Purposes"), the selection and admission of students;

- the provision of education and enrichment to our students, including the administration of our curriculum; monitoring student academic progress and educational needs; reporting on the same internally and to parents; administration of students' entries to public examinations, and providing references for students (including after a student has left);
- the provision of educational support and related services to students;
- the safeguarding of students' welfare and provision of pastoral care, welfare, health care services and support;
- the provision of a safe and secure environment for students, staff, and visitors to the school (including the use of CCTV in accordance with our CCTV Policy);
- compliance with legal and regulatory requirements;
- operational management including the compilation of student records; the administration of invoices, fees and accounts; the management of school property; the management of security and safety arrangements (including the monitoring of the school's IT and communications systems in accordance with our Responsible Use Policy; the administration and implementation of our school's rules and policies for students and staff; and the maintenance of historic archives;
- staff administration including the recruitment of staff/engagement of contractors; administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;
- to address any queries, disputes, or concerns involving you or your child.
- analysing website traffic, demographics and behaviour through the use of analytical tools and cookies;
- the promotion of our school through our website[s], our prospectus and other publications and communications (including through our social media accounts);
- maintaining relationships with our alumni and former employees;
- for keeping a record of historical and memorable events relevant to the maintenance of a historical record;
- provide you with the services, and functionality offered through the Site and fulfil your requests, including, but not limited to; communicate with you about your enquiry or use of the Site, services, or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service;
- communicate with you about special events and other marketing communications; operate and improve the Site, services, and functionality; process and provide events to attend; if applicable;
- to gather feedback through surveys, such as those conducted for our school improvement initiatives;
- tailor your experience on the Site, including search results and displaying relevant promotions;

- link or combine with other information we get from third parties to help understand your needs and provide you with better service; perform statistical analysis; protect, investigate, and deter against fraudulent, unauthorised, or illegal activity;
- comply with our policies, procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain information, we may not be able to fulfil the requested Purpose of collection, such as to respond to your queries or provide the Site to you.

Retention

We will retain your information for the period necessary to fulfil the Purposes outlined in this Policy and as otherwise needed to comply with applicable law and our internal policies.

How We Share Your Information

We may disclose your personal data to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of British School Al Khubairat (BSAK) or others, or to respond to emergencies.

We may otherwise share your information as directed by you or subject to your consent.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as examination boards, the school's Nurses, the school's professional advisors and relevant authorities. 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.

We may also share data with the parent–teacher association in order to facilitate parental participation. Moreover, some of our systems are managed or operated by third parties (e.g. hosted databases, school website, school calendar, school post and my school portal or cloud storage providers).

We may share personal data with trusted third-party service providers (data processors), including software platforms, educational technology (edtech) tools, and other companies or individuals who assist us in delivering our educational and administrative services. These third parties are only given access to the data necessary to perform their specific functions on our behalf. This ensures we can provide a high-quality learning environment and support the day-to-day operations of the school.

Sharing data with these parties is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not transfer personal data you have provided unless we are satisfied that the personal data will be afforded an equivalent level of protection.

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

Moreover, we may transfer data to other countries, but in doing so will rely either on the existence of adequacy agreements or upon standard contractual clauses as part of agreements with data processors. For more information on how we transfer data to other countries is available upon request by contacting our Data Management Committee by emailing dataprotection@britishschool.sch.ae

What Is Our Legal Basis for Processing Your Personal Data?

We may process your personal data for the above purposes based on one or more of the following legal bases:

- we have an individual's consent to do so (or their parent's, if appropriate). You can withdraw your consent at any time by emailing dataprotection@britishschool.sch.ae
- it is necessary for the performance of a contract (e.g. an employment contract with a member of staff);
- it is necessary for our compliance with our legal obligations. In this respect, we may use personal data to exercise or perform any right or obligation conferred or imposed by law in connection with employment; and/or for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- it is necessary to protect an individual's vital interests (in certain limited circumstances, for example where a student has a life-threatening accident or illness while at school and we have to process that student's personal data in order to ensure the student receives prompt and appropriate medical attention);
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for reasons of substantial public interest, including safeguarding purposes;
- it is necessary for medical purposes, including medical diagnosis and the provision of health care or treatment for students, managing related health care systems, and/or for assessing the working capacity of staff;
- it is necessary for archiving, research or statistical purposes;
- It is necessary for BSAK as the data controller, or you as the data subject, to fulfil obligations and exercise established rights in the field of employment as permitted by law.

Consent

Under data protection laws, the rights belong to the individual to whom the data relates (i.e. the data subject). However, where consent is required as the lawful basis for processing personal data relating to students we will often rely on parental consent.

In general, we will assume that students' consent is not required (and that other lawful bases are more appropriate, as described above) for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student's activities, progress and behaviour,

and in the interests of the student's welfare; unless, in the school's opinion, there is a good reason to do otherwise.

However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the student or other students, or is required by law.

Security of Your Information.

British School Al Khubairat (BSAK) takes commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit we minimise the risk of unauthorised access or disclosure; when entering information on the Site, you can check this by right clicking on the padlock icon in the address bar.

Storage of information. The British School Al Khubairat (BSAK) hosting operations are based in the UK and we store most of our data within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected. Some of our social media channels are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However we only allow this when we are certain it will be adequately protected. (e.g. US Privacy Shield or Standard EU contractual clauses).

Your Rights.

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- The erasure of your personal data in certain circumstances
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

- If you would like to exercise any of your rights under data protection law for which we are the data controller, you can contact us to request to exercise these rights at any time, below. Make your request by emailing us at dataprotection@britishschool.sch.ae. Please note that these rights are not absolute, and we may be entitled or required to refuse requests where exceptions or exemptions apply. If we choose not to action your request we will explain to you the reasons for our refusal.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits.

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 dataprotection@britishschool.sch.ae of any significant changes to important information, such as contact details, held about you.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent. Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest. In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing. You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Keeping your information. We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

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, please contact us at dataprotection@britishschool.sch.ae

Changes to this Policy.

Except to the extent limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on the Site, and as required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the "Last Updated" date at the top. You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using the Site. If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of the Site.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable

Contact Us.

If you have any questions about this Policy or information we have collected about you, please Contact Us. We will aim to respond to all queries within 30 days.

What to do if you're not happy. In the first instance, please talk to us directly so we can resolve any problem or query. You can contact us at dataprotection@britishschool.sch.ae

If you are in the United Arab Emirates, you are entitled to lodge a complaint with the Telecommunications and Digital Government Regulatory Authority (TDRA) by contacting them at Info@tdra.gov.ae or by calling them on:

Toll Free Call +971 800 12

International Calls +971 4 7774444

Controller Details

The British School Al Khubairat (Al Khubairat Community School)

PO Box 4001,

Abu Dhabi,

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