

PARENT AND PUPIL PRIVACY NOTICE

INTRODUCTION

We are committed to protecting and respecting your privacy.

This privacy notice is applicable to parents and pupils (including any applicant parent and students and former parent and students) and sets out the basis on which any Personal Data we collect from you, or which is provided to us, is handled by us. This privacy notice is issued pursuant to applicable data protection laws.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

For the purposes of any applicable data protection laws, we are the "data controller", which means we are responsible for deciding how we hold and use the Personal Data about you.

WHAT DO WE MEAN BY "PERSONAL DATA" AND "PROCESSING"?

Depending on the applicable data protection law:

"Personal Data" typically means any data relating to an identified natural person, or one who can be identified directly or indirectly by way of linking data, using identifiers such as name, voice, picture, identification number, online identifier, geographic location, or one or more special features that express the physical, psychological, economic, cultural or social identity of such person. It also includes Sensitive Personal Data.

"Process" or **"Processing"** typically means any operation or set of operations which is performed on Personal Data using any electronic means, including Processing and other means. This process includes collection, storage, recording, organisation, adaptation, alteration, circulation, modification, retrieval, exchange, sharing, use, or classification or disclosure of Personal Data by transmission, dissemination or distribution, or otherwise making it available, or aligning, combining, restricting, blocking, erasing or destroying Personal Data.

"Sensitive Personal Data" typically means any data that directly or indirectly reveals a nature person's family, racial origin, political or philosophical opinions, religious beliefs, criminal records, Biometric Data, or any data related to the health of such person, such as his/her physical, psychological, mental, genetic or sexual condition, including information related to health care services provided thereto that reveals his/her health status.

"Biometric Data" typically means Personal Data resulting from Processing, using a specific technique, relating to the physical, physiological or behavioural characteristics of a Data Subject, which allows or confirms the unique identification of the Data Subject, such as facial images or dactyloscopy data.

PERSONAL DATA– WHAT WE HOLD AND WHY WE PROCESS IT

Depending on whether you are a parent or a student, the information you give us may include the following information about you:

- full name;

- date of birth and year group;
- contact details (including home address, school and personal e-mail addresses, and mobile, home and/or work phone numbers);
- parent login information (i.e. username and password) for the parent portal;
- financial and credit card information;
- photographs, videos and/or voice recordings;
- passport details, nationality and other information relating to immigration status (e.g. residency permit ID);
- current and previous educational records and achievements;
- student emails;
- student academic records and test results; and
- (where appropriate) family circumstances.

We may also collect, store, and use Sensitive Personal Data about you such as:

- race, religion and ethnicity; and
- health records and reports (including special education needs, medical or physical conditions and accidents or injuries in school).

With regard to each of your visits to school websites we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.

Our school website may contain links to/from other partnering websites within our network, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

WHERE THE DATA COMES FROM

You may give us your Personal Data, in a number of ways. These include:

- using, visiting or interacting with our website / school websites (such as filling out forms or registering);

- visiting us / one of our schools;
- corresponding with us by phone, e-mail, or post; and/or
- sending information directly to us; for example, when paying our fees, giving us medical records or information, completing school admission forms, signing our parent contract or providing any other information as requested by us and/or which is necessary from time to time.

We may be working closely with third parties (including, for example, your previous or new school(s), social services, health practitioners, photographers, local authorities, education authorities, business partners (such as extra-curricular activities providers), payment and delivery services, debt collectors, lawyers and credit reference agencies) and may receive information about you from them. We may also use CCTV footage to ensure the school is safe which may include video footage taken of you. We may receive information about you if you use any of the other websites we operate or any of the other services we provide.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a court order relating to you which impacts on our use of your information to protect the child's welfare.

In particular, child protection services or health practitioners may provide us with information (particularly Sensitive Personal Data) about you which may need to be added to the school's child protection or special educational needs file. This kind of Processing of Sensitive Personal Data may be necessary: (a) for the purposes of carrying out our legal obligations, (b) for medical diagnosis or provision of health care and/or (c) to protect the vital interests of you or another person taking into account your mental and physical capacity. To achieve this, we may also use software applications and other technology.

We may also do the following:

- keep a list of your allergies or medical requirements within the classroom or staffroom in case of emergency. It is necessary for the school to have a list readily available to our staff so that we are able to look after you promptly in the event of a medical emergency; and
- rely on software applications and other technology to Process medical information (such as allergies, accidents and injuries) about you. For further information on the kind of technology we use, particularly in the context of Processing Sensitive Personal Data about you, please contact our Middle East Data Protection team (contact details below).

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

Depending on the applicable data protection laws, there are various legal bases on which we can rely in order to Process your Personal Data in a compliant manner. We have summarised the applicable legal bases and outlined what each mean in the following table.

Further information on the purposes for Processing we undertake and the types of Personal Data it involves is provided under the *What Are The Purposes For Which We Process Your Personal Data* section below.

<i>Legal basis</i>	<i>Ground for Processing</i>	<i>Explanation</i>
Contract	If the Processing is necessary to perform a contract to which you are a party or to take, at your request, procedures for	This would cover any contractual duties and/or exercising our contractual rights under any

	concluding, amending or terminating a contract.	contract we have with you. It would also apply to Processing required prior to the conclusion of any parent or localised government education contract but which is required for the contract to be concluded.
Legal Obligation	If the Processing is necessary to fulfil obligations imposed by other laws	Ensuring we perform our legal and regulatory obligations, such as our child safeguarding requirements.
Consent	You have given specific consent to the Processing of your Personal Data.	You also have the right to withdraw your consent at any time.
Legitimate Interests (to the extent permitted by applicable data protection laws)	The Processing is necessary for our legitimate interests.	This covers instances where we have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests Processing your Personal Data. We can only Process your Personal Data where the Processing fulfils our legitimate interest as a business and our Processing does not prejudice your interests or rights.
Legal Proceedings	If the Processing is necessary to defend against any action to claim rights or legal proceedings.	This covers instances where we need to Process your Personal Data as part of a dispute (or potential dispute).
Vital or Public Interest	If the Processing is necessary to protect your life or the life of another natural person	This covers instances when we need to process your health information to provide or procure emergency care for you.

WHAT ARE THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA?

We have outlined the legal bases, under the relevant data protection laws, on which we Process your Personal Data above. Below are also examples of the practical purposes for which we will Process your Personal Data.

We may need to collect certain Personal Data in order to provide you with any service or, otherwise, to comply with our obligations under applicable laws and regulations. If we are not provided with the Personal Data requested, we may not be able to provide some or all of our services.

For example,

<i>Purpose</i>	<i>Examples of Personal Data that may be Processed</i>	<i>Grounds for Processing</i>
To onboard (offboard) you as a student	Name, DOB, nationality, contact numbers, email address, home address, photography, gender, passport and resident information, medical information, religion	Consent Contract
To deliver educational services to you	Name, DOB, nationality, contact numbers, gender, email address, home address, photography, passport and resident information, medical information	Contract
To conduct government checks on you	Full Name, DOB, nationality, gender, contact numbers, email address, home address, photographs, passport, and resident information.	Legal obligation
To protect your welfare and ensure efficient school management	Full Name, DOB, gender, nationality, contact numbers, email address, home address, photography, religion, passport and resident information, medical information	Legal Obligation
To store information on the school's information management system	Full Name, DOB, gender, nationality, contact numbers, email address, home address, photography, passport and resident information, medical information	Contract
To use your photograph for school IDs and Reports	Photographs/ Images	Consent

To use your image, video recordings, and/or voice recordings of you for internal use	Photographs, Videos, Voice recordings.	Consent
To manage queries or disputes/complaints raised by you	Full Name, Email address, Telephone Number	Consent Contract
To provide you with information about school events or extra-curricular services such as ENRICH ME	Full Name, Email address, Telephone Number	Contract Consent
To keep you updated after you leave the school (e.g. as part of an alumni programme).	Full Name, DOB, nationality, contact numbers, email address, home address, photographs.	Contract
To support educational delivery and school operations via technology/technologies	Full Name, DOB, nationality, contact numbers, email address, home address, photography	Contract
To comply with legal obligations, such as keeping admissions registers, attendance records, pupil files, behaviour sanctions, annual reports, etc.	Full Name, DOB, nationality, contact numbers, email address, home address, photography, passport and resident information, medical information	Legal Obligation
To contact you if you have made an enquiry to one of our schools via our online enquiry form and/or to inform you about available places in the future	Full Name, gender, DOB, contact numbers, email address	Consent
To administer our school website and for internal operations, including data analysis, testing, research, statistical and survey purposes	Full Name, DOB, nationality, contact numbers, gender	Contract Consent
To allow you to participate in interactive features of our service, for example virtual	Full Name, email address DOB	Contract

learning environments, when you choose to do so		
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DATA SHARING

WHY MIGHT YOU SHARE MY PERSONAL DATA WITH THIRD PARTIES?

We will share your Personal Data with third parties where required by law, where it is necessary to administer our relationship with you, or where we have another reasonable interest in doing so.

WHICH THIRD-PARTY SERVICE PROVIDERS PROCESS MY PERSONAL DATA?

“Third parties” include third-party service providers (including software and document management providers) and other entities within our group. We may share your personal data with the following third parties, some of which may be located overseas:

- local government authorities (including education authorities), child protection services or the local police;
- immigration authorities;
- business partners, professional advisors, debt collectors, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- insurance providers;
- other schools to which you have transferred to;
- extra-curricular activity providers.

We rely on software applications and other technology provided by third party companies to handle your Personal Data. These include virtual learning environments (including the setting of tasks and homework), revision tools, parents evening booking systems, text and email messaging communications, assessments of your progress and co-ordination of school trips. The companies we use to deliver these applications are carefully chosen by us to ensure that your information is kept secure.

When sharing Personal Data, we will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Workplace Privacy Notice and that the appropriate legal safeguards, to the extent applicable, are in place prior to the transfer in accordance with the relevant Data Protection Laws; for example, by entering into approved standard contractual clauses.

WHEN MIGHT YOU SHARE MY PERSONAL DATA WITH OTHER ENTITIES IN THE GROUP?

We may share your Personal Data with our group head office based in the United Arab Emirates as part of our regular reporting activities on company performance, to provide you with certain centralised services, for system maintenance support and for the hosting of data. We may also share your Personal Data in the event a specific incident occurs at one of our schools. We ensure

appropriate and suitable safeguards are in place for any cross-border transfers of Personal Data between members of the group.

WHAT ABOUT OTHER THIRD PARTIES?

We may disclose your Personal Data to third parties if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply the terms of the contract between us and you.

WHERE WE NEED TO GET YOUR CONSENT

We will not market services to you (other than for the purposes set out above) as a parent of a student without your consent and you have the right to ask us not to use your contact details for marketing. Should you wish to withdraw your consent to receive marketing, you may do so at any time by contacting the Middle East Data Protection Team (contact below).

In certain, limited, circumstances, where we Process your Personal Data for specific purposes, we may seek your separate, express, consent. This includes where we would like to use photographs, video recordings or voice recordings of you for external purposes, whether on our school website, social media feeds, etc.

You do not have to give us details about your race, religion or ethnicity if you do not want to, although we may need to obtain such Personal Data about you if requested by local government authorities. Where we are provided with this Personal Data, we only use it to assist us with very specific tasks (for example, if your religion means that you have particular dietary requirements; prayer commitments, etc.).

Where you have given consent to any of the Processing of your Personal Data listed above, you can withdraw this consent at any time by contacting the Middle East Data Protection Team (contact details below).

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will not keep your Personal Data for longer than is necessary for the purpose for which it was collected.

As a general rule, we keep education records until the student reaches 25 years of age at which point we destroy the file. This is regardless of whether your file has been transferred to another school, in the event that you transfer schools.

For more information about our data retention practices, please see our 'Data Retention and Deletion Notice'.

CHANGE OF PURPOSE

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

USE OF OUR WEBSITE

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our school website and or any parent/ pupil portal, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best

to protect your Personal Data, we cannot guarantee the security of your data transmitted to our school website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

COOKIES

Our school website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our school website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy which is made available on our school website.

DATA SUBJECT RIGHTS

Depending on the data protection laws applicable to the Processing of your Personal Data, you may be afforded certain rights which you can exercise in certain circumstances. We have outlined the data subject rights that may be granted to you under applicable data protection laws below, along with a concise explanation for each of these rights. For certain processing such as (the use of modern technologies such as artificial intelligence) we may need to process your Personal Data including for training purposes. This may impact your right to request the deletion or rectification of your Personal Data or objection to certain processing. Where we are unable to handle your request, we will notify you and provide further information. Where the applicable data protection law affords you these rights, you can exercise them by reaching out to the Middle East Data Protection Team (contact details below).

Data Subject Rights (subject to applicable law):

- **The right to obtain information relating to your Personal Data:** You may have the right to obtain information about your Personal Data that we Process.
- **The right to access your Personal Data:** You may be entitled to ask for a copy of your Personal Data.
- **The right to data portability:** In certain circumstances, you have the right to request the transfer of this data to yourself or to another party (e.g. another school).
- **The right to correct or request the deletion of your Personal Data:** You may have the right to ask us to correct any inaccurate Personal Data concerning you. You may also have the right to request that the Personal Data we hold about you is deleted or where there is no legitimate reason for us continuing to Process it. Please note that we may also be required to delete your Personal Data under certain legal or regulatory requirements.
- **The right to withdraw your consent:** As noted above, you may have the right at any time to withdraw any consent that you have provided to us to Process your Personal Data. Withdrawal of your consent shall not impact the lawfulness of our Processing prior to its withdrawal.
- **The right to restrict or stop our Processing of your Personal Data:** You may have the right to request that we either limit the Processing of your Personal Data to a certain purpose or time period or that we stop Processing your Personal Data altogether (e.g., if the Processing relates to direct marketing or profiling).
- **The right to object to automated Processing:** It may be necessary for us to conduct certain automated Processing activities using your Personal Data. In such circumstances, you may have the right to object to any automated Processing that has any legal or similar consequences for you.

CHANGES TO OUR PRIVACY NOTICE

Any changes we make to this privacy notice in the future will be posted on our school website. Please check back frequently to the website to see any updates or changes to our privacy notice.

COMPLAINTS AND QUERIES

Cognita is committed to upholding the highest standards in the Processing of Personal Data. Therefore, we take all complaints regarding our Processing of your Personal Data very seriously. If you feel that our Processing of your Personal Data is unfair, misleading, or inappropriate, please let us know by contacting the Middle East Data Protection Team (details below).

CONTACT DETAILS

In Processing your Personal Data, we act as a data controller.

Cognita has a group Data Protection Officer (“**DPO**”) who is responsible for overseeing compliance with applicable data protection laws and to oversee this notice. That post is currently held by Jayne Pinchbeck, General Counsel. Email: DPO@cognita.com

As noted above, if you have any day to day questions about this Workplace Privacy Notice or how we Process your Personal Data, please contact the Middle East Data Protection Team on Dataprotection.me@cognita.com.