

Confidentiality Policy

International School of Bucharest („ISB”, „School”, or „us”) is headquartered in Șoseaua Gării Cățelu nr. 1R, Bucharest, District 3, Bucharest, Romania and is operated by Lumina Instituții De Învățământ Foundation, headquartered in Șoseaua Colentina nr. 64B, District 2, Bucharest, Romania, registered with the Register of the Associations and Foundations of Sector 2 Courthouse under no. 02/16.03.2011, Fiscal Code RO16224225. ISB is an educational establishment providing pre-school, primary, lower secondary and upper secondary education corresponding to the educational system of England and Wales, based on Certificate no. 1112 of 18.05.2016 issued by the Ministry of National Education, accredited by the Council of International Schools, member of COBIS.

ISB manages personal data in accordance with the General Data Protection Regulation no. 679/2016 in force in the European Union (GDPR). For this purpose, ISB acts as a controller of your personal data and of the personal data of its pupils, namely ISB establishes the purposes and means of processing for personal data.

ISB processes the personal data of its employees, potential, current and former pupils, but also of their parents or legal representatives during its daily activities of provision of educational services.

According to GDPR, the term processing means any operation performed on personal data, whether by automated means, such as collection, recording, storage, adaptation, alteration, consultation, use, disclosure by any means, erasure, or destruction.

Please take the necessary time to read this confidentiality policy and to understand the data processing operations performed by ISB.

We want the personal data processing to be completely transparent, therefore we present you below all the information you need in relation to this topic.

1. Why ISB processes personal data:

ISB processes personal data which belong to you or to the pupils for the following purposes:

- Provision of educational services, starting from the admission process, pupils' registration, class and schedule management, teaching activities, management of exams, contests, issuance of school documents
- Provision of complementary educational services: personal development, personal counselling, access to the school library, extra-curricular activities, clubs, school trips, management of school publications, creation of a virtual learning environment and granting of access to the school internet and Intranet network, as well as the monitoring of the use of
- school networks
- Ensuring security in the campus: monitoring of access in the campus, video surveillance
- Ensuring medical assistance and psychological counselling in case of need
- School management: management of pupils' files and educational documents, management of invoices and payments, internal audits and controls, elaboration of reports, implementation of school policies, ensuring collaboration with other schools, archiving, assessment of the quality of our services

- Communication in school: transmission of messages related to the pupils and activities of the school by any means of communication
- Settlement of disputes and litigation

2. The categories of personal data processed by ISB include, without limitation, the following:

- Information and contact details: surname and first name, nationality, country of origin, address, information included in the identity cards/passports, phone number, e-mail, etc;
- Bank details;
- Medical documents: medical history, allergies, vaccination sheet, diseases, results of medical examinations and other medical documents of the pupils;
- Data related to the educational environment and the pupils' academic performance: academic results and half-yearly assessment reports, pupils' discipline and conduct, hobbies, results of educational tests, teachers' feedback, etc;
- Data about the family: parents' profession and workplace, etc;
- Authentication and identification data: e-mail, passwords, location data, other online identification details, etc;
- Photos and videos.

Generally, personal data held by ISB have been provided directly by the parents or because of the interaction between the parents and pupils with the school.

3. Legal basis of personal data processing operations

ISB collects and processes personal data based on the consent you give before any processing of personal data, according to art. 6 para. 1 letter a) of GDPR.

Please note that a tuition contract must be concluded to benefit from educational services. In this respect there are a few categories of personal data necessary to the school for the steps initiated by you to enter an admission process and to conclude the tuition contract. The categories of personal data are included in the Registration Form. The failure to fill in all the information marked as mandatory in the form will lead to the impossibility for the school to process your request and to conclude a contract with you.

Given that ISB provides educational services considered as services of public interest, in accordance with the applicable provisions in the education field, many data processing operations performed by the school strictly for educational purposes will have as legal basis for processing the performance of a task of public interest.

Regarding the processing of the special categories of personal data according to GDPR, namely medical information, please take into consideration that the school processes medical information based on the following legal reasons:

- The medical practice processes such data for prevention and occupational health programmes, for the diagnosis and provision of medical care or treatment based on the European and national legislation;
- The processing is necessary for reasons of considerable public interest based on European or national legislation. Such legal basis is used especially in those situations

in which the school must assess a pupil's learning capacity and adapt the teaching activities to his/her personal needs.

- The explicit consent given by you for the disclosure of pupils' personal data related to the allergies they suffer from.

4. Disclosure of personal data

ISB discloses your personal data only to the school employees, staff and collaborators who need access to personal data mainly for ensuring the provision of educational and complementary services. In this respect, please consider that only the medical practice has access to the pupils' medical files. Other school departments have access to specific medical information based on the consent you have expressed or to protect a substantial public interest based on the European or national legislation (for example, certain diseases which trigger special learning needs).

Regarding the disclosure of your data to third parties, outside the school, please note that data transmission takes place only within the daily activity of the school.

5. Transfers to third countries

ISB may transfer the pupils' personal data to other countries, such as Great Britain (Cambridge International Examinations) or Switzerland (International Baccalaureate Organisation).

6. Storage of personal data

ISB stores all your personal data if you are in a contractual relation with the school, and afterwards within the maximum deadline established by the law for each category of personal data. The School keeps the pupils' files and all the data related to the pupil's interaction with the school, mainly with the purpose of assessing the school activity and the quality of the services provided, but also to answer the pupils' potential requests related to their educational path within the school, requests which usually occur after the pupils finish its studies.

However, please consider that all the school documents related to the study activities are kept for an indefinite period, according to the legal obligations which the school has in this respect. In case a legal provision requires a minimum retention period, the school will keep the personal data for at least that mandatory period.

7. Your rights related to personal data processing by ISB

GDPR provides certain rights related to personal data processing from which you and the ISB pupils benefit. In this respect, please consider that the pupils who have an appropriate level of understanding might exercise the rights listed in this section individually.

ISB respects all the rights mentioned in GDPR and undertakes to provide the appropriate means by which you can exercise these rights according to the details mentioned below:

- The right to access personal data, which implies the possibility to obtain the confirmation from the school whether your personal data are processed or not by

our school and, if the case may be, you have the right to request access to such data, as well as additional information related to personal data, such as: purpose of the processing, categories of recipients to whom the personal data are disclosed and the estimated storage period. In the situations when you need to exercise this right, please contact ISB and request the confirmation or the access to your personal data by filling in the Form for request of access to personal data and sending it by e-mail. Please bear in mind the specific categories which constitute exceptions, such as information which identifies other persons, or which is subject to confidentiality obligations.

- The right to rectification which allows you to request the rectification by ISB of any incorrect personal data which the school may hold, as well as to supplement your incomplete personal data.
- The right to erasure means that in the situations expressly regulated by law you may request the erasure of your personal data. Please take into account the fact that the law stipulates the possibility of deleting the personal data when their processing is unlawful or when the processing is based on your consent, and you have withdrawn this consent.
- The right to data portability which implies your right to receive the personal data in a structured, commonly used, and machine-readable format and to forward such data to another personal data controller. This right to data portability will apply only to the personal data which you have provided to us and for which the processing is made by automated means based on your consent or for the compliance with the contract which you have concluded with ISB.
- The right to object to your personal data processing by ISB for reasons related to your situation. This right applies to the situations when ISB relies on your consent as a legal basis for personal data processing.
- The right to lodge a complaint represents the right to contest the way in which ISB performs the processing of your personal data to the competent data protection authority.
- The right to withdraw your consent given for various processing operations when the consent represents the legal basis for processing. In case you withdraw consent to your personal data processing, please note that the processing will end when you submit the request, without producing effects on the processing which has taken place before the consent withdrawal.

8. Creation of educational profiles

Based on a username and password, ISB allows the parents/legal representatives the access to the Education virtual catalogue where the daily reports related to the pupil's activity, homework, teachers' comments may be seen.

9. Video surveillance

ISB has implemented a video surveillance system in the campus to ensure the security of the pupils, of the staff and of all the other persons who have access to the campus. Our pupils' safety and security represent our main concern and these video cameras allow us to provide protection in real time.

10. Contact

If you wish to exercise any of the rights listed above, or to obtain additional information or clarifications related to your personal data processing, please contact ISB by means of the person responsible for data protection in school in accordance with GDPR – Data Protection Officer. DPO contact details: dpo@edusoftech.eu.

In case this Confidentiality Policy is amended in the future, we will make the new version public on the school's website.

Last updated: April 26, 2023.

