

Policy on Privacy

Introduction

FOLEY'S SCHOOL (hereafter referred to as "the School") commits to privacy and secure processing of the personal data it maintains for their clients, associates and collaborators, in an open and transparent manner. The School is also committed to the collection and processing of any personal data, in full compliance with the General Regulation on the Protection of Personal Data of the European Union (Regulation 2016/679, GDPR) (hereafter referred to as "the Regulation") and the legislation in force in Cyprus that governs the collection and processing of Personal Data of Individuals (L. 125 (I)/2018). Personal Data involves any Data relating to an identified or identifiable natural person ('data subject').

The ***Foley's School Privacy Policy*** governs the collection, use, disclosure, transfer, and storage of Personal Data. Going through the School's privacy practices enables all data subjects in relation to the School to understand how Foley's School deals and processes with their Personal Data. This document includes and explains the following fields regarding the processing of Personal Data:

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1. Relevant Definitions

Under the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), the meaning of each of the following terms is given below:

- a **Personal Data** – includes any information relating to an identified or identifiable natural person (data subject), being one who can be identified directly or indirectly by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural, or social identity of that natural person.
- b **Special category Data** – includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- c **Data Processing** – involves any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- d **Data Controller** – includes a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- e **Data Processor** – includes a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
- f **Third Party** – involves a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- g **Consent** – involves the data subject and means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them.

2. The purpose of the School processing your personal information

If you are from the European Economic Area (EEA), the School's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data the School collects and the specific context in which this data is collected. The School may process your Personal Data:

- i to perform a contract with you
- ii due to your given consent to do so
- iii since processing is in the School's legitimate interests, and it is not overridden by your subject rights
- iv for payment processing purposes
- v to comply with the law

The School uses the collected information for the following purposes:

- To provide and maintain school services.
- To notify you about changes to school services.
- To allow you to participate in interactive features of school services when you choose to do so.
- To provide client support.
- To gather analysis or valuable information so that the School can improve their services.
- To monitor the usage of the services provided.
- To detect, prevent, and address technical issues.

To provide you with news, special offers and general information about other services and events the School offers.

3. The lawful basis for processing

The Lawfulness of Processing as stated in Article 6.1(a-f) of the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR):

Processing shall be lawful only if and to the extent that at least one of the following applies:

- i The data subject has given consent to the processing of their personal data for one or more specific purposes.

- ii Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering a contract.
- iii Processing is necessary for compliance with a legal obligation to which the controller is subject.
- iv Processing is necessary to protect the vital interests of the data subject or of another natural person.
- v Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, where the data subject is a child.

4. The type of personal Information processed by the School

The School collects personal data from pupils, parents/guardians, collaborators etc., to support teaching and learning, to provide care and to assess how the school is performing. The School also receives data from other organisations including, but not limited to, other schools and the Ministry for Education.

This data includes, but is not restricted to, the following:

- Name and Surname
- Date of birth
- Identification/passport number
- Contact details (contact address/telephone/email)
- Results of internal assessment and externally set tests
- Data on pupil characteristics, such as ethnic group or special educational needs etc.
- Exclusion information
- Details of any medical conditions, medical certifications

Paper-based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept secure when not in use. Papers containing confidential personal

information are not left on office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access. Where personal information needs to be taken off site (in paper or electronic form), this will be carried out in accordance with the School's data-flow-mapping document. Additionally, passwords are used to access school computers, laptops, other electronic devices, and access to educators and applicants (pupils, parents / guardians). Staff and pupils, who store personal information on their personal devices are expected to follow the same security procedures for school-owned equipment.

5. The way the School processes your personal information

The School will not share information without given consent unless the law and the School's Policies allows for this. Individuals who wish to receive a copy of the information held by the School about them/their child should refer to **Section 10** within this Policy.

The School is required, by law, to pass certain information about pupils to specified external bodies, such as the local authorities and the Ministry of Education, enabling the completion of relevant statutory obligations.

The School also uses the collected data, and some of the School's employees have access to such data, only to the extent required to carry out services on behalf of the clients and the School. The School has also introduced appropriate technical and organisational measures to protect the confidentiality, integrity, and availability of all data during storage and processing.

6. The use of cookies by the School's website

A cookie is a small piece of data (text file) that a website asks your browser to store on your device to remember information about you, such as your language preference or login information. Cookies do a lot of different jobs, such as letting you navigate between pages efficiently, remembering your preferences and generally improving the user experience. They also help that the advertisement you see online are more relevant to you and your interests.

The School uses only necessary cookies to make the website work. Necessary cookies are absolutely essential for the website to function properly. These cookies ensure basic functionalities and security features of the website, anonymously.

7. The way the School protects your personal information

The School takes appropriate technical and organisational security measures (including physical, electronic, and procedural measures) to safeguard your Personal Data from unauthorized access, unlawful use, intervention, modification, or disclosure under the requirements of the Regulation.

Only authorized employees are permitted to access Personal Data, and they may do so only for permitted business functions. In addition, the School provides relevant training to all employees on how to handle, manage and process personal data, applied upgraded technical measures, and transformed school policies and procedures in a way that comply with the European General Data Protection Regulation.

8. Your subject rights under the Data Protection Legislation

- a Right to Access** – You have the right of access to your personal information that the School processes and details about the type of processing, by enquiring a Data Subject Access Request (DSAR) to receive this information.
- b Right to Rectification** – You have the right to request that information is corrected if it is inaccurate. You can usually update your own information by contacting the School to make the changes on your behalf.
- c Right to Erasure (Right to be Forgotten)** – You have the right to request that your information is removed/erased; depending on the circumstances, the School may or may not be obliged to action this request. You have the right to request the deletion of Personal Data only if one of the following reasons is true:
 - i. Personal Data is no longer necessary in relation to the purposes for which it was collected or processed.
 - ii. If the processing is based on your consent and you have withdrawn this consent (on which processing is based) in accordance with Articles 6.1(a) and 9.2(a) of the Regulation and if no other legal basis, for processing, applies.

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- iii. If you object to processing in accordance with Article 21.1 of the Regulation and there are no compelling and legitimate reasons for processing.
 - iv. If personal Data has been processed illegally.
 - v. If personal Data should be deleted in compliance with a legal obligation under EU law to which the School is subject to.
 - vi. If the personal data has been collected in relation to the provision of referred to in Article 8.1 of the Regulation, where “conditions applicable to child’s consent in relation to information society services”, provided that the child is at least 14-years old.
- d Right to Object** – You have the right to object to the processing of your information; depending on the circumstances, the School may or may not be obliged to action this request.
- e Right to Restriction of Processing** – You have the right to request that the School restricts the extent of their processing activities; depending on the circumstances, the School may or may not be obliged to action this request.
- f Right to Data Portability** – You have the right to receive the personal data which you have provided to the School in a structured, commonly used, and machine-readable format suitable for transferring to another controller.
- g Right to lodge a complaint with a supervisory authority** – If you think that the School has infringed your privacy rights, you can lodge a complaint with the relevant supervisory authority. You can lodge your complaint in the country where you live, your place of work or place where you believe the School has infringed your right(s).

You can exercise your rights by sending an e-mail to dpo@foleyschool.com. Please state in the subject of your email, that your request concerns a privacy matter, and provide a clear description of your requirements.

9. Information retention period by the School

The School will only retain Personal Data collected for as long as is necessary to satisfy the purpose for which it has been collected. The period for which Personal Data is kept and is necessary for compliance and legal enforcement purposes, varies and depends on the nature of legal obligations.

To the extent the School has collected your Personal Data for purposes of provision of services, customer management, and customisation of content as described above, your information is kept

for as long as you are associated with the School, as needed to provide you with respective services and in compliance with the relevant laws of Cyprus.

Any Personal Data collected under the lawful basis of the consent, such as contact details for communication purposes will be deleted when you withdraw your consent, and this can be done at any given time requested. For further information regarding specific retention period, please contact the School's Data Protection Officer at dpo@foleysschool.com.

10. Changes to the School Privacy Policy

The School may modify or revise the privacy policy documents from time to time. Although the School may attempt to notify you when major changes are made to this privacy policy, you are expected to periodically review the most up-to-date version found at the School's portal, so you are aware of any changes.

11. Contact details for any queries

If you have any questions about this privacy policy or the School's data-handling practices, please contact the School's Data Protection Officer via the School's contact address/telephone/email provided below:

Foley's School in Cyprus:

- Contact address: 2 Nikis Avenue, 4108 Limassol, Cyprus.
- Contact telephone: +357 2588 7777
- Contact email address: dpo@foleysschool.com

Submission of a Complaints: If you feel that your concerns regarding the use of your personal data or any of your data protection rights have not been addressed by the School, you have the right to contact the School's Data Protection Officer at dpo@foleysschool.com and submit a formal complaint. You also have the right to submit a complaint with the Personal Data Protection Commissioner's Office at <http://www.dataprotection.gov.cy>.

Date of Last Update: 01 / 09/ 2024