

## Policy on Pupil Personal Data Protection

Updated July 2025

### Introduction

This Privacy Policy explains how and why, **Foley's School** ("the School"), collects data about you, what the School does with this data, and explains your rights under the General Data Protection regulation (GDPR). In legal terms, the School constitutes the data controller, as they determine the means and/or purposes of the processing of the personal data held by them. In some cases, the School has the role of the processor, whereby they process data on behalf of a controller. Whether the School acts as a controller or the processor, the personal data stored and processed, within **Foley's School**, follows the current policy.

The GDPR governs how the School takes care of the data held about you. The first principle of the Regulation is that your personal data must be processed fairly and transparently. Foley's School has an obligation to let you know how they will take care of the personal data that you provide about yourself and what this data will be used for.

### 1. Definitions (as they are safeguarded by EU law)

- **"Personal Data"** includes all the data concerning an identified or identifiable natural person ("data subject"); identifiable natural person is that whose identity may be established, directly or indirectly, particularly by reference to an identifier, such as name, identity card number, location, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, financial, cultural, or social identity of the said natural person.
- **"Processing"** includes 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.
- **"Special Categories Personal Data"** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or participation in a trade-union, as well as

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genetic data, biometric data, data concerning health or the sex life of a natural person or their sexual orientation.

## 2. Reason for Collection and Use of Your Personal Data

The School might process personal data relating to pupils and gather the following data to facilitate, with the provision of pupil academic services, and other associated functions. The School processes pupil personal data such as name, age, nationality, gender, email, telephone number, ID number, passport number and other data to register a pupil at Foley's School.

## 3. Legal Bases for Collection, Use and Disclosure of Your Personal Data

There are different legal bases that the School relies on to collect, use and disclose your Personal Data, namely:

- **Consent:** the School will rely on your consent to use (i) your Personal Data for marketing and advertising purposes; (ii) your Personal Data for other purposes when asking for your consent and for which the purpose of the process does not relate to the services, the School offers to you.
- **Performance of contract:** the use of your Personal Data for purposes of providing the services, customer management and functionality and security as described above is necessary to perform the services provided to you under our terms and conditions and any other contract that you have with the School.
- **Compliance with legal obligation:** the School has a permit to use your Personal Data to the extent required to comply with a legal obligation to which they are subjects.
- **Protection of your vital interests:** the processing of your Personal Data is necessary to protect your vital interests if you are physically or legally incapable of giving consent.
- **Protection of the School's legitimate interests:** the processing of your Personal Data is necessary for the purposes of the legitimate interests pursued by the School or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, where the data subject is a child or a young adult.

**4. The Data that the School Collects, Holds and Shares may include:**

The School holds personal data about pupils to support teaching and learning and to assess the quality of the performance and education provided by Foley's School. The School may also receive data about pupils from other organisations including but not limited to: Universities, Colleges, the Ministry of Education, National Statistics Authority etc.

The abovementioned data may include but is not restricted to:

- Basic details such as name, address, date of birth, phone number.
- Exam/assessment results.
- Academic achievements.
- Data on pupil characteristics such as ethnic group, any special educational needs, personal/familial circumstances (e.g., death of a loved one) that could affect mental state and therefore the studies of pupils.
- Details on any medical conditions that may affect your studies.
- Images of the CCTV system the School has installed in its broader premises.

**5. General Data Retention Time**

Academic records are retained by Foley's School for a period up to 75 years after a pupil's graduation in accordance with the Pupils' Archive requirements set out in the Cyprus Private Schools (Establishment, Operation and Control) Law of 2019.

Any data included in a pupil's personal file and not related to academic records will be deleted 2-years after their graduation.

Financial data kept for payment purposes, will be deleted 7-years after the corresponding transaction.

Any data collected under the lawful basis of the consent, such as an email address, telephone number and postal address for communication purposes will be deleted when consent is withdrawn. Consent may be withdrawn at any given time.

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The CCTV images of the School's premises are kept for the necessary period to ensure the security of the people visiting, working or studying within these premises and to secure the infrastructure and assets of the School for unlawful actions.

**6. Sharing of Personal Data**

The School will not share data about pupils with anyone without the pupil's consent unless the law and the School's policies allow for that. Data subjects who wish to receive a copy of their collected data they may request this from the School.

The transfer of certain data about pupils to specified external bodies which include the Ministry of Education, the Cyprus Agency of Quality Assurance and Accreditation in Higher Education, the Migration Services, the Foundation for the Management of EU Lifelong Learning programs, is required from the School by Law, so that these bodies can meet their statutory obligations.

It may also be required by statutory bodies, for the School to share basic data, such as name and contact address, as part of enabling the carrying out of statutory duties of these organisations.

In any event that the School should share personal data with third parties, apart from the Public Authorities, they will ensure a Data Processing Agreement (DPA) is in place that will establish the rules of such transfer and ensure the security and privacy of your data and will provide only the minimum amount of personal data necessary to fulfil the purpose for which the data is required to be shared.

Some personal data may be transferred, by the School, to financial institutions and/or auditors and/or legal representatives to execute payments or take other actions for the execution of a contract or to be in accordance with the Law.

Personal data of individual data subjects is not shared with anyone without given consent unless the Law permits this. You have the right to refuse/withdraw consent to data sharing at any time, and any possible consequences shall be fully explained, such as expected delays in receiving response to individual requests.

## 7. Security of Personal Data

All the necessary technical and organisational measures shall be taken to protect given Personal Data based on the Regulation from wrongful use, intervention, alteration or disclosure.

## 8. Rights in relation to the Personal Data in the context of the EU

The following constitute rights held by the pupil in accordance with the provisions of the Regulation and the legislation in force concerning Personal Data (these rights are not absolute and in certain cases are subject to conditions as specified by the applicable legislation).

- **Right to Access** – You maintain the right of access your Personal Data and also the right to be given a copy of the data kept and submitted for processing.
- **Right to Rectification** – You have the right to demand rectification of any incomplete or/and inaccurate Personal Data kept by the Institute about his/her person.
- **Right to Erasure** – You have the right to ask for the erasure of your Personal Data. The right is not absolute as there are conditions in the Regulation under which the School is required to keep your data even though you have requested erasure of the data.
- **Right to Object** – You have the right to object to the processing of your Personal Data at any time and for reasons related to your given situation, unless there are compelling reasons for processing, which override your interests, rights and freedoms.
- **Right to Restrict Processing** – You have the right to ask for restriction of Personal Data processing, so that the School may no longer process the given data (e.g., until the accuracy or reason for processing are established) until the restriction is lifted.
- **Right to Portability** – You have the right to ask for the transmission of the Personal Data you have provided to the School, in a structured, commonly used and digital/electronic format and, in certain conditions, the School is entitled to transmit this data to another organisation, where such transmission is technically feasible.
- **Right to Object to Automated Individual Decision Making, including Profiling** – You have the right to ask not to be subjected to any decision taken exclusively by automated processing, including profiling, if such decision has legal or similar important effects on the subject.
- **Right to withdraw consent** – In a limited number of cases where you may have given your consent for the collection, processing and transfer of Personal Data for a specific purpose, you

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shall have the right to withdraw such consent at any time. The withdrawal shall only be valid in the case where it does not affect the legitimacy of processing that was based on your consent before the withdrawal, and any other processing pursued on any other legal grounds.

#### **9. No Error Free Performance**

Foley's School does not guarantee error-free performance under this privacy policy and informs their pupils that they shall use reasonable efforts to comply with this privacy policy and will take prompt corrective action when noticing any failure of compliance with their privacy policy. The School shall not be liable for any incidental, consequential or punitive damages relating to this privacy policy.

#### **10. Communication**

In case you require any clarification, or additional data, or wish to exercise any of your rights and/or file a complaint, you can contact the School's Data Protection Officer (DPO).

Foley's School contact:

- Address: 2 Nikis Avenue, 4108 Limassol, Cyprus.
- Telephone: +357 2588 7777
- Email: [dpo@foleysschool.com](mailto:dpo@foleysschool.com)

In addition to the above, you have the right to file a direct complaint to the competent supervisory authority, if you consider that the processing of Personal Data on behalf of Foley's School breaches the applicable legislation regarding data protection. You can also file a formal complaint to the Commissioner's Office in charge of Protection of Personal Data processing procedures at the contact address below:

- Office Address: Iasonos 1, 1082 Nicosia, Cyprus.
- Postal address: P.O.Box 23378, 1682 Nicosia
- Telephone number: +357 22818456
- Fax number: +357 22304565
- Complaint filing at website: <http://www.dataprotection.gov.cy/>

#### **11. Amendment of Policy**

This Policy may, from time to time, be updated and a new version published when the School undertakes important changes, including a change of their DPO. For this reason, pupils are requested to periodically review the Policy, to remain informed about the way in which Foley's School uses and protects their Personal Data.