

Privacy statement for students and parents

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1 Introduction

Esprit Schools takes the privacy of your child(ren) (hereinafter: child) and you very seriously. As part of our daily work, we are careful to process, use and protect information about your child and you (the data subjects) in a secure manner. If your child attends school with us, we will process personal data about your child and you. This privacy statement is intended to explain which data we process and for what purpose. This privacy statement also specifies your rights regarding the processing of this personal data. We encourage you to read this privacy statement carefully. If you have any questions, please feel free to contact us by e-mail at privacy@espritscholen.nl.

Once your child is enrolled or going to school with us, we will start processing personal data about your child and you. Processing includes storing this data, supplementing it, providing it to our partners and eventually, also deleting it.

You can read more about the processing of your data in our online cookie policy when you visit our website.

2 Who is Esprit Schools?

Esprit Schools is an educational board consisting of 14 schools. It provides primary and secondary international education in and around Amsterdam. Inspired by our motto 'Learning without boundaries in Amsterdam', we pursue excellent education for our students, valuable work for our employees and constructive collaboration with our local environment.

3 What is personal data?

Personal data is information that tells us something about your child or you, or that we can relate to your child or you. You share personal data with us when you enrol your child or when your child attends school with us. Examples include name, phone number, address or gender. It concerns all the data we can associate with your child or you.

4 When do we process your personal data?

The following rules of thumb summarise the key principles for properly handling personal data. At Esprit Schools, we always check that we comply with these principles before processing your personal data. The articles below explain the principles in detail.

1. Purpose and purpose limitation

Purpose limitation means that personal data may only be processed for a well-defined, explicit and legitimate purpose described in advance. The purpose then determines which uses are allowed and which uses are not.

2. **Basis**

The purpose must be specific and the use of personal data for each purpose must be lawful. This requires that each purpose can be grounded on one of the legal bases listed in the GDPR. The GDPR specifies the following legal bases:

- 1) you have given consent to the use of your personal data;
- 2) the use of personal data is necessary for the performance of an agreement;
- 3) the use of personal data is necessary for compliance with a statutory obligation;
- 4) the use of personal data is necessary to protect the vital interests of a data subject or third party;
- 5) the use of personal data is necessary for the performance of a task in the public interest or in the exercise of official authority;
- 6) the use of personal data is necessary to pursue the legitimate interests of Esprit Schools.

3. **Data minimisation**

Esprit Schools may not collect more data than is strictly necessary for its intended purpose. Personal data that is not or no longer needed should not be processed and should be deleted.

4. **Transparency**

Esprit Schools explains in this privacy statement which data we process and for what purpose.

5. **Data integrity**

When Esprit Schools processes personal data, we take care to ensure that the information is accurate and up to date. If we discover that this is not the case, we will update or delete the data.

5 What do we use your personal data for?

5.1 General

We collect and use your child's and your personal data only for the purposes for which the personal data was provided to us, and therefore to the extent necessary to provide effective education and for related purposes. More specifically, the purposes for which we process personal data about your child and you can be described as follows:

- preparing for teaching, including timetabling;
- conducting effective education, including teaching, administering tests and providing teaching materials;

- the intake, transfer and graduation of students, including the enrolment and deregistration of students and their assignment to groups and classes;
- conducting projects and field trips;
- the collaboration of students among themselves and with teachers;
- recording and handling absence;
- guiding students and providing appropriate education;
- collecting voluntary tuition fees;
- providing care for students;
- securing funding for education;
- maintaining contact with former students;
- providing or making learning resources available;
- taking and publishing school photos¹.

Personal data may also be processed for other legitimate purposes including compliance with or investigation of actual or suspected violation of laws, regulations or internal regulations. The legal bases for processing this personal data for these purposes are:

- internal control, audit and company security;
- ensuring security within and around the schools, and protecting property belonging to students, parents, staff and visitors;
- conducting legal proceedings involving Esprit Schools.

5.2 Images and footage

5.2.1 General

We only process photos as a means of identifying your child, or with explicit consent from you.

5.2.2 Enhancing the quality of colleagues

Esprit Schools is responsible for providing educational quality by means of competent teachers who teach high-quality lessons. Recording of footage by and of colleagues for the purpose of self-reflection and enhancing quality can therefore be done without asking for consent. These recordings are only used internally and only for collegial self-reflection and quality enhancement.

5.2.3 Student teachers and interns

Students who are training for a career in education are required to complete a number of internships as part of their training. During those internship periods, they sometimes make video recordings when they are teaching a class. These recordings are used as self-reflection tools or as assessment tools for the training institution. Our school's students often appear in these recordings along with the student teacher.

¹ If you have provided consent for this.

A basis is required in order to make recordings. In this case, the basis is a public task, namely teacher training and assessment. No consent is required for this. The recordings made may only be used by and for the student as a self-reflection or assessment tool. The recordings may not be used for grading or discussing students, or for publication.

5.3 Camera surveillance

We use camera surveillance at a number of locations. The purpose of this is to protect our company property and property belonging to your child, you, our colleagues and visitors, to secure access to locations, and to record incidents. The cameras are positioned both visibly and invisibly, and are identified by means of signs/stickers. The legal basis for camera surveillance is the legitimate interest of Esprit Schools.

5.4 Purposes and legal bases

The aforementioned reasons (purposes) for processing your personal data are also the legal bases for this processing, namely the necessity of the processing operations:

- the representation of our legitimate interests in conducting business operations effectively and efficiently at Esprit Schools;
- your consent;
- compliance with our statutory obligations.

5.5 Automated decision-making

Esprit Schools does not use automated processing to make decisions about matters that could significantly affect individuals. This concerns decisions made by computer programmes or systems, without the intervention of a human being (for example, an employee of Esprit Schools).

5.6 The police

If the police demand data from us by means of a court order, Esprit Schools is obliged to cooperate. The police may only request data in situations specified by law. For example, to solve certain types of crimes. In this situation, Esprit Schools does not have to determine whether providing data is compatible with the purposes for which it was collected.

The police may ask Esprit Schools to provide data concerning your child or you. This is different from demanding or requiring the data. In that case, there is no duty to provide the data. Accordingly, Esprit Schools will not provide data to the police unless the data subjects have given consent or it is of vital importance.

6 Do we process special and/or sensitive personal data?

Sensitive data, such as a person's race, religion or state of health, is called special personal data. This data is subject to extra protection. To provide your child's education, we collect the following special and sensitive personal data:

- Citizen service number (BSN)
The BSN is used for interactions with government agencies such as the Education Executive Agency (DUO).
- Limited medical information
This concerns medical information about the health of your child, such as diabetes or allergies, that is required or necessary to ensure a safe learning environment.

7 Which personal data do we process?

We process a variety of personal data belonging to existing and former students and parents. The following is a summary of the data involved.

Category	Students	Parents	Former students
Contact details	X	X	X
Education participant number	X		
Nationality and place of birth	X		
Medical data	X		
Religion			
Study progress ²	X		X
Educational organisation	X		
Finances	X	X	
Images	X		
Teacher, care coordinator, internal counsellor, dean, mentor	X		
Citizen service number (BSN)/personal identification number (PGN)	X		
Chain ID	X		

² With regard to former students, this refers only to certificates and final lists of grades.

8 Are you required to provide us with data?

In some cases, we are required by law to collect personal data, or we need your child's or your personal data in order to carry out our work. We undertake to ask only for the personal data strictly necessary for the purpose at hand. If you do not provide the necessary personal data, we may not be able to provide your child with an education.

9 With whom do we share personal data?

Esprit Schools does not sell your data to third parties and only provides it where necessary to achieve effective education. This includes the following:

- Student records system
- Administrative systems (Microsoft, Google, timetable programme)
- Educational systems (ELO, publishers of education methods, digital learning tools)

We enter into processing agreements with those companies that process personal data on our behalf, in order to ensure that your data is handled with the same level of security and confidentiality. We remain responsible for these processing operations.

10 How long do we store personal data?

Esprit Schools will not store your child's or your personal data for any longer than is strictly necessary to fulfil the purposes for which the personal data was collected. Esprit Schools adheres to the relevant laws and regulations in this respect. The retention periods can be found in the processing register. You can view these through the data protection officer.

11 How can you view or edit your personal data?

11.1 For parents/caregivers

11.1.1 Is your child under the age of 16?

You as parents or legal representatives have the authority to make decisions about your child and exercise their rights: the right to see data, to request a copy, the right to change or supplement the data and the right to have the data partially or wholly destroyed.

11.1.2 Is your child 16 years old or older?

Your child may make their own decisions and give or withhold consent when asked for it. Your child may also view their own file and ask for the data to be changed or partially or wholly destroyed. As a parent or legal representative, you may not do this. You will only be able to look at your child's file, change something or request its destruction if your child authorises you to do so.

11.2 For students

11.2.1 Are you under the age of 16?

Then your parents may look at your file to see what we have written down about you. If it contains something that is incorrect, such as your address because you have moved, your parents may ask us to change it.

11.2.2 Are you 16 years old or older?

Then you may look at your own file. Your parents are not allowed to do this. You may also ask us to change certain data, for example if we have recorded your address incorrectly. If you want your parents to be able to look at your file, change something, or ask for it to be destroyed, you must indicate that.

11.3 Procedure

If you are entitled to do so, you may submit a request to view, correct, supplement, delete, or have your child's or your personal data transferred, or a request to withdraw your consent or object to the processing of the personal data. You can submit this request to the school principal, or by sending an e-mail to privacy@espritscholen.nl.

Esprit Schools will handle requests as quickly as possible, and in any case no later than one month after receiving the request. Depending on the complexity and number of requests, this deadline may be extended by one month if necessary. In the event that the deadline is extended, the applicant will be informed within one month after their request has been received.

11.4 Complaints

If you believe that the actions or omissions of Esprit Schools are not in accordance with the GDPR or other applicable laws or regulations, you may submit a complaint in accordance with the Esprit Schools complaints procedure. Information about the complaints procedure can be found on the Esprit Schools website.

You can also contact the Esprit Schools data protection officer by e-mail at privacy@espritscholen.nl.

If you feel that a complaint has not been handled correctly, you can file a complaint with the national regulator, the Dutch Data Protection Authority. You can do so at the following link: <https://autoriteitpersoonsgegevens.nl/en/submitting-a-tip-off-or-a-complaint-to-the-dutch-dpa>

12 How do we secure your personal data?

Esprit Schools takes the protection of your child's and your data seriously and takes appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised modification.

At Esprit Schools, individuals have access to personal data only to the extent actually necessary. Employee access to personal data is therefore limited to the data necessary for the effective performance of their duties and therefore their work. Anyone involved in processing this personal data is obliged to maintain confidentiality.

If you suspect that your data is not properly secured, or there are indications of its misuse, please contact the school's principal or send an e-mail to privacy@espritscholen.nl.

13 Who is our data protection officer (DPO)?

Because we believe that it is important to protect your privacy, Esprit Schools has appointed its own external data protection officer (DPO). The DPO oversees the protection of personal data, and the application of and compliance with the General Data Protection Regulation (GDPR). If you have any questions or complaints, you can contact the DPO using the information below.

Name: Mark van der Staaij

E-mail: privacy@espritscholen.nl

14 Where can you report a data breach?

A data breach involves the unintentional destruction, loss, alteration or sharing of personal data. The personal data was not protected, or may have been lost or unlawfully processed. An example of a data breach is the loss of a USB flash drive containing personal data. Forwarding personal data to the wrong recipient is also a data breach.

If you discover or suspect a data breach, you can report it by sending an e-mail to privacy@espritscholen.nl. You will receive a substantive response within 72 hours of making the report.

15 Further questions

This privacy statement may be updated to reflect changes to legislation and regulations or the way we process personal data. This version was prepared on 13 January 2022. The most recent version can be found on all Esprit Schools websites.

If you would like to learn more about Esprit Schools' policy on privacy and data processing and how we use your personal data, please send an e-mail to privacy@espritscholen.nl.