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DATA PROTECTION POLICY

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Our Mission Statement:

Achieving Excellence Together!



This policy is written in conjunction with the Staff Handbook and other relevant LTSM Policies.

1. Purpose

1.1 LTSMI (also referred throughout this document as “the School”) has as one of the main values the privacy and confidentiality of all people, especially those whose personal data we process. Within that commitment, the protection of our students’ personal data is essential.

1.2 In accordance with the provisions above, the purpose of this policy is to give you information about what, how and why we collect your personal information, how we may use that information and with whom we may share it and why. Our Privacy Policy also describes the measures we take to protect the security of your information. We also tell you how you can contact us to get answers to questions you may have about our privacy practices and how you can exercise your rights over your personal data. The School is strongly committed to compliance with [the European General Data Protection Regulation \(GDPR\) 2016/679](#) together with other local and international laws on the protection of personal data in force in each country inside and outside the European Union, as well as the rest of the applicable legislative bodies in matters of child protection and education among others.

1.3 It goes without saying that the School is committed to the protection of minors, and watches at all times for the safeguarding of their interests.

1.4 The School must comply with privacy legislation and this policy. This policy will be regularly reviewed and updated to take account of new laws in force, new technologies and the changing of the School environment when required. Please ensure you have read the current version of this policy.

2. Scope

2.1 This policy is intended to provide information to parents/guardians and students as well as board members, employees, interns, volunteers, contractors and people visiting the School’s site. It describes the type of information that the School collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

2.2 The School is the Data Controller as it processes personal data about current, past and prospective students and their parents, legal representatives or guardians (referred to in this policy as "parents") as well as the subjects mentioned above and third parties who, with their consent, communicate their personal information.

2.3 The School staff, parents and students are all encouraged to read this data protection policy and understand the School’s obligations to its entire community.

2.4 This data protection policy also applies in addition to the School 's other relevant terms and conditions and internal and external policies, including any contract between the School, staff, parents of students (and



students themselves over age of legal competence), safeguarding and internal policies like retention of records policy, the School's policy on the use of cameras and images at the School, social media policy, safeguarding policy, exams policy, data protection policy for employees, policy on the use of CCTV or biometric data, policies of confidentiality and privacy, information security policy, ICT policies and health and safety policy, among others, including how concerns or incidents are recorded.

3. Terms & Definitions

3.1 Personal Data: any information related to an individual or 'Data Subject', that can be used to directly or indirectly identify the person. This can be anything from a name or address to a photograph, voice or banking details and includes one or more factors related to someone's health and economic, cultural or social identity.

3.2 Minor: a data subject under the age of full legal responsibility related to data protection and especially the legal age to consent. Under the GDPR, the default age at which a person is no longer considered a child is 16, but it allows European member states to adjust that limit between 13 and 16. In South Africa the legal age of consent is 16.

3.3 Data Subject: is any physical individual whose personal data is being collected, held or processed.

3.4 Data Controller: any organisation, person, or body that determines the purposes and means of processing personal data, controls the data and is responsible for it, alone or jointly.

3.5 Data Processor: a data processor processes the data on behalf of the data controller. Examples include catering services, school transport, psychological services, extracurricular classes, etc.

3.6 Consent: is any "freely given, specific, informed and unambiguous" indication of the individual's wishes by which the data subject, either by a statement or by a clear affirmative action, confirms agreement to the processing of personal data by the data controller for one or more specific purposes.

3.7 Data processing: is any operation performed on personal data, such as collection, storage, transfer, modification, deletion, etc., whether or not by automated means.

3.8 Personal information: is any information related to an identified or identifiable natural person and that is recorded in any form. For example, a person's name, address, phone number and age. Pseudonymised information (see definition below) about students can also be personal information.

3.9 Biometric Data: personal data that results from specific data processing related to physical and behavioural features of a person, which allows the identification of that person (e.g., fingerprints).

3.10 Genetic data: data related to a natural person's genetic characteristics, whether inherent or acquired, which offers information about the mental or physical health of that person.



3.11 Data concerning health: personal data referring to the personal mental and physical health of a person, including information on health services accessed.

3.12 Sensitive personal data: data relating to religious or other beliefs, sexual orientation, health, race, ethnicity, political views, trade union membership, criminal record, etc.

3.13 Data Protection Officer (DPO): is a role required by GDPR with formal responsibility for overseeing a company's data protection strategy and its implementation to ensure compliance with GDPR requirements.

3.14 Data Protection Authority (DPA): it is a national authority responsible for the supervision of the implementation and protection of data and privacy as well as implementing and enforcing data protection Law. Every European country will have its own DPA. For instance, in Romania it is [The National Supervisory Authority For Personal Data Processing](#), in the UK it's the [Information Commissioner's Office \(ICO\)](#), etc.

3.15 Pseudonymisation: the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

3.16 Profiling: any automated processing that uses personal data to evaluate certain personal aspects and predicts future actions and aspects relating to an individual, or to analyse or predict in particular that person's performance at work, economic situation, location, health, personal preferences, reliability, or behaviour.

3.17 Representative: a natural or legal person established in the EU, appointed by the data processor or controller to represent him with respect to the obligations under the regulation. It can also refer to a person which acts on behalf of the data subject, e.g., legal tutor of a minor.

3.18 Third party: is any natural or legal person, public authority, agency, or any other body other than the data subject, the controller, the processor, and the persons who, under the direct authority of the controller or the processor, are authorised to process data.

3.19 Legitimate interests: are referred to the rights and freedoms of those individuals which could be affected by the data processing carried out by a company or organisation. The purposes of the data processing must be based on legal ground.

3.20 Rights of the data subjects: Data subject rights are one of the key areas of the General Data Protection Regulation (GDPR) and the national data protection laws which implement it in every European country, as well in other countries outside Europe. From 25 May 2018, data subjects can request a wider group of rights against businesses and organisations that process their personal data. You can review them at paragraph 7 of this policy.



3.21 Parental responsibility: means the legal rights, duties, powers, responsibilities and authority a parent has for a child and the child’s education. A person who has parental responsibility for a child has the right to be informed and make decisions about their academic information, care and upbringing. Important decisions in a child’s life must be agreed with anyone else who has parental responsibility.

4. Data Protection Principles

4.1. The GDPR establishes eight enforceable principles that must be adhered to at all times:

4.1.1 Lawfulness, fairness and transparency: the School acts in compliance with the GDPR requirements and always provides transparent and clear information to the individuals about the type of data and the reason for its collection. Transparency means “concise, transparent, intelligible and easily accessible form, clear and plain language”;

4.1.2 Purpose limitation: the School only collects personal data for a specific purpose as long as necessary to complete that purpose;

4.1.3 Data minimisation: the School only processes the necessary personal data to achieve its processing purposes;

4.1.4 Accuracy: the School takes the measures to ensure that the personal data is accurate and updated, having regard to the purposes for which it is processed, and corrects it if not;

4.1.5 Storage limitation: the School deletes personal data when it’s no longer necessary;

4.1.6 Integrity and confidentiality: the School counts on the appropriate technical and organisational safeguards that ensure the security, integrity and confidentiality of the personal data;

4.1.7 Accountability: the School is responsible to comply with the GDPR requirements and of the ability to demonstrate it;

4.1.8 Consent: The School will obtain consent from the data subjects for the data processing, basically for collection, use or disclosure except where the law states exemptions, grants permission, or creates a requirement for collection, use, or disclosure of personal information.

4.2 Requirements for consent to collection, use or disclosure of personal information may vary depending on the circumstance and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, what form of consent is appropriate, the School will take into account both the sensitivity of the personal information and the purposes for which the School will use the information. Consent may be express, implied (including through use of “opt-out” consent where appropriate), or deemed. For example, if an individual provides to the School his/her mailing address and requests information regarding a particular service, consent to use the address to provide the requested information may be implied. On giving reasonable written notice to the School, an individual may withdraw



consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent, the School will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, the School will stop collecting, using or disclosing the personal information as requested. If a person provides the School or its service providers or agents with personal information about an individual, the person represents that it has all necessary authority and/or has obtained all necessary consents from such individual to enable the School to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

4.3 Personal data shall be kept secured and protected by the technical and organisational measures which ensure an appropriate degree of security, integrity, confidentiality and privacy.

4.4 Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

4.5 The School shall sign a data sharing agreement when we are sharing personal or other sensitive data with other parties involved in any data sharing activities.

5. What information Do We Collect?

The School collects the following type of information:

5.1 Information about students, their parents or tutors and their representatives, provided directly by them or their authorised persons.

5.2 Information about job applicants, staff members, interns, volunteers, visitors, contractors, customers, advisors as well as those of its affiliates and third party agents engaged in supporting the School business, provided directly by them or their representatives.

5.3 Information about third parties or potential students or clients interested in the School services and who provided their consent to the processing of their data for the purposes set forth in this policy.

6. How Do We Collect Your Personal Data

6.1 Personally and over the phone: from students and their family, staff, visitors, contractors, job applicants and others.

6.2 From electronic and paper documentation: including job applications, emails, invoices, enrolment forms, letters to the School, medical forms, consent forms (for example: enrolment, extracurricular activities, etc), our school's websites or the School controlled social media.

6.3 Online tools: such as apps and other software used by the School.

6.4 Photographs or other audio-visual contents for educational or marketing purposes with due information and consent of the data subject.



6.5 CCTV cameras located at our schools premises.

7. Your Rights in Data Protection

7.1 The School holds the appropriate data protection policies, procedures and training to implement your data subject's rights according to the European legislation. Your rights as data subjects are the following:

7.1.1 Right of access: you can request access to your personal data;

7.1.2 Right to rectification: you have the right to obtain from the data controller without undue delay the rectification of inaccurate personal data. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement;

7.1.3 Right to erasure (or “right to be forgotten”): you have the right to obtain from the controller the erasure of personal data if one of the following grounds applies:

- (a) your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) you withdraw your consent on which the processing is based and where there is no other legal grounds for the processing;
- (c) you exercise your right to object to the processing and there are no overriding legitimate grounds for the processing;
- (d) your personal data has been unlawfully processed;
- (e) your personal data has to be erased for compliance with a legal obligation in the European Union or legislation of a member state to which the controller is subject;
- (f) your personal data has been collected in relation to the offer of information society services (online shopping);

7.1.4 Right to restriction of processing: the School will implement and maintain appropriate procedures to assess whether your request to restrict the processing of your data can be implemented. Where the request for restriction of processing is carried out, then the School will write to you confirming that the restriction has been implemented and when the restriction is lifted.

7.1.5 Right to data portability: the School processes your personal data because there is a legal basis for the processing. Where the School has collected your personal data by consent or by contract, then you have the right to receive the data in electronic format or to give the file to another data controller.

7.1.6 Right to object: You have the right to object to the processing of your personal data in specific circumstances. Where such an objection is received, the School will assess each case on its merits.

7.1.7 Right not to be subject to automated decision making: You have the right not to be subject to a decision based solely on automated processing, where such decisions would have a legal or significant effect concerning you. At present there is no automated processing within the School. If in the future such



processing is undertaken, the School will ensure that where systems are implemented, an appropriate right of appeal is available to you.

7.1.8 Right to complain: the School is committed to provide a complaints process whereby you will be able to contact the Data Protection Officer. The Data Protection Officer will work with you to bring the complaint to a satisfactory conclusion for both parties. You will also be informed of your right to bring your complaint to the Data Protection Authority and their contact details.

7.1.9 Right to withdraw your consent: You have the right to withdraw your consent freely and at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

8. Why The School Needs to Process Your Personal Data

8.1 Consent is the basis for processing personal data and it must be freely given, specific, informed, unambiguous and granted under solid information that the School guarantees at all times. Your consent is our legitimation for the data processing.

8.2 In order to carry out ordinary duties to staff, students and parents, the School may process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation. Some of this activity needs to be carried out in order to fulfil their rights, duties or obligations, including those developed under a contract with their staff, parents or students themselves if they are emancipated.

8.3 Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data. The School expects that the following uses may fall within that category of "legitimate interests":

8.3.1 For the purposes of student selection (and to confirm the identity of prospective students and their parents).

8.3.2 To provide education services, physical training or spiritual development, career services, extra-curricular activities and monitoring students' progress and educational needs. To provide school transport services, catering, specialised care, etc.

8.3.3 Maintaining relationships with Alumnae and the School community, including direct marketing or fundraising activity.

8.3.4 For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests.



8.3.5 For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records).

8.3.6 To enable relevant local or international authorities to monitor the School's performance and to intervene or assist with incidents as appropriate.

8.3.7 To give and receive information and references about past, current and prospective students, to/from any educational institution that the pupil attended or where it is proposed they attend, and to provide references to potential employers of past students.

8.3.8 To enable students to take part in national or international assessments, and to publish the results of public examinations or other achievements of students of the School.

8.3.9 To safeguard students' welfare and provide appropriate pastoral care.

8.3.10 To fulfil the School's contractual and legal obligations.

8.3.11 To monitor (as appropriate) the use of the School's ICT and communications systems

8.3.12 To make use of photographic images of students in the School's publications on the School's website and (where appropriate) on the School's social media channels. For security purposes, including CCTV.

8.3.13 Besides the aforementioned uses, regarding the School's staff, for the selection and recruitment processes, professional background, assessment of suitability and qualification for the position, criminal records, hiring, payroll, entries and removals in the personnel registers, etc and where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

8.4 In addition, the School may need to process a special category of personal data (concerning health or religion) or criminal record information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards to safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

8.4.1 To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of School trips.

8.4.2 To provide educational services in the context of any special educational needs of a pupil.

8.4.3 To provide spiritual education in the context of any religious beliefs.



8.4.4 In connection with employment of its staff, for example DBS checks, welfare or pension plans.

8.4.5 For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with the legal obligations and duties of care.

9.Types of Personal Data Processed

This will include by way of example:

9.1 Names, addresses, telephone numbers, e-mail addresses and other contact details.

9.2 Car details (for those who use our car parking facilities).

9.3 ID numbers, passports, insurance, background checks.

9.4 Bank details and other financial information, e.g. about parents who pay fees to the School; past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), employment information and examination scripts and marks.

9.5 Past, present and prospective parents' employment information, family status, documents issued by a Court or by a public authority, powers of attorney, etc.

9.6 Where appropriate, information about individuals' health, and contact details for their next of kin.

9.7 References given or received by the School about students, and information provided by previous educational establishments and/or other professionals or organisations working with students.

9.8 Images of students (and occasionally other individuals) engaging in the School activities, and images captured by the School 's CCTV system (in accordance with the School's policy on Taking, Storing and Using Images of Students).

9.9 Information relating to past, present and prospective School staff.

9.10 The School also processes data from its staff, suppliers, interns, volunteers, officers, agents, contractors, advisors as well as those of its affiliates and third party agents engaged in supporting the School.

9.11 The purposes for which the School uses personal information of the aforementioned data subjects may include, among others:

9.11.1 Administering the individual's employment or contract, as the case may be.

9.11.2 For insurance purposes.

9.11.3 Marketing purposes.



9.11.4 To satisfy the School's legal obligations, especially related to child protection legislation.

10. Transfer of Information Between Schools

10.1 When a student has been accepted at, and is enrolling to another school, the School transfers information about the student to that new school. This may include copies of the student's school records and health information.

10.2 This enables the new school to continue to provide the services for the education of the student, to support the student's social and emotional wellbeing and health and to fulfil legal requirements among other obligations.

11. Storing and Securing Information

The School shall use the appropriate technical and organisational measures to ensure the security, confidentiality, integrity and privacy of the personal data, preventing from unauthorised access or unlawful processing against accidental loss, destruction or damage of the files.

12. Updating Your Information

The School endeavours to ensure that the information that we process is always accurate, complete and up to date. To update your information, please contact the corresponding School's Human Resources department, Finance department, Admissions and Administration departments.

13. Sharing Your Information

13.1 The School will only share your information with third parties on a need-to-know basis and with your consent except in cases relating to legal requirements, safeguarding of children, criminal activity, or if required by legally authorised bodies (e.g., Courts, police, social services, etc). If we decide to share information without parental consent and strictly under the cases stipulated by Law, we will record this in the student's file, clearly stating our reasons.

13.2 We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the students in our care.

13.3 Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the daily operation of our business, for example to run our payroll and accounts, legal advisors, etc. Any such third parties comply with the GDPR and the applicable data protection regulations.

14. Parental Responsibility

14.1 In cases of shared parental rights, regardless of who has legal custody, both parents have the right to receive the same information about the circumstances that occur in their child's educational process, which



obliges the School to guarantee the duplication of the information unless a judicial resolution is provided that establishes the deprivation of parental rights to any of the parents to some type of criminal measure prohibiting communication with the minor and / or his/her family. All conflicts that could arise between parents in this regard must be brought before a family and juvenile court.

14.2 Parents will have the right to access to the academic and educational information of their children, even if they are of legal age or emancipated, as long as they incur alimony or education or food expenses, in which case the legitimate right of information of the parents will prevail on the privacy rights of the student of legal age or emancipated.

15. Sending Commercial Communications

15.1 The School may send you information or materials such as prospectuses, leaflets, newsletters, etc by e-mail or postal mail under your consent when you submit your postal or email address via Website. By ticking the box in the corresponding consent form, you are authorising to the School the sending of such commercial information or materials.

15.2 You can also authorise or unauthorise the communication of your data for the same purposes among other Inspired schools.

15.3 You can withdraw your consent at any time, so if you do not want to receive promotional information.

16. Consent to Use Your Image

16.1 The School emphasises the importance of celebrating pupil success and as such photos and videos of our pupils are often used to showcase their skills and talents, as well as the day-to-day life of the school.

16.2 The School is committed to the protection of the image of our students and we take compliance with data protection regulations very seriously, especially regarding consent to the publication of audio-visual contents and the protection of confidentiality and privacy of our students, staff and other people who may appear in our publications.

16.3 The School would request authorisation from parents prior to sharing the students' audio visual contents on the School websites, marketing, social media channels, press and extracurricular activities. Students of legal age can give their consent by themselves without parental authorisation without prejudice to parental supervision.

16.4 The School will never disseminate any photograph or video without the parents or data subject's previous consent.

16.5 The School has an official photographer who attends special events at the school and who is also compliant with the data protection law requirements.



16.6 On the other hand, although it is allowed for parents to take pictures of their children in special and organised events and celebrations within the schools facilities, the School is not responsible for the use that parents make of the images nor for claims of third parties that may appear in the photographs of the parents without their consent.

16.7 In addition, the School does not authorise the use of the contents of its publications by third parties nor is reliable for the responsibilities that may arise for these third parties from these unauthorised uses. In cases in which the student's image will be used for specific advertising purposes, the School, through the central marketing services, will send parents the corresponding information about the use of the images and its duration as well as a sample of the photographs to be used, ensuring your consent. Similarly, your consent will be collected annually for the taking and use of your child's image for the school yearbook.

16.8 In relation to the activities carried out outside the school, the consent of parents or students with legal age is required when these activities are not carried out in the exercise of the educational function. When the recording or taking of photos is done by third parties, that is, by those responsible for the activity or institution that is visited by the students, it will be the obligation of these third parties to obtain the consent through the school.

16.9 In order to preserve the safety and privacy of students and parents in the School's facilities, it is strictly forbidden to record videos or take photographs within the facilities except in specific organised events or circumstances in which it is permitted and with the limitations set forth above.

17. Period of Retention

Personal information will only be retained for the period of time required to fulfil the purpose for which it was collected. Once the personal information is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

18. Data Accuracy and Security

18.1 The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the School at least on an annual basis of any changes to information held about them. Responsibility for changes in information relating to students rests with the parents.

18.2 The data subject has the right to request that any inaccurate or out-of-date information about them be erased or corrected.

18.3 The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to the School's systems. The School personnel will be made aware of this policy and their duties under Data Protection Law and receive relevant training.



19. Cookies

19.1 The School website, <https://scoala-mea.com>, tracks web browsing patterns to better understand how our website is being used. This generic information is collected through the use of session cookies. The cookies used by our websites are associated with an anonymous user and their computer, and they are not related to the user's personal data.

19.2 The cookies used in our websites are all temporary, with the sole purpose of making future transmission more efficient. In no case will the cookies be used in order to collect personal data.

19.3 IP Addresses: The website servers will automatically be able to detect the IP Address and domain name used by the user. All of this information is collected in a file about server activity that allows subsequent processing of data with the aim to collect statistical measurements only, which show the number of printed pages, the number of visits to web services, the reasons for the visit, the point of access, etc.

19.4 Security: The website uses information security technologies which are accepted throughout the industry, such as Firewalls, methods to control access and cryptic mechanisms. All of these have the objective of preventing unauthorised access to the data. In order to carry out these purposes, the user/ client accepts that the provider collects data for purposes of authentication for access control.

We may update the cookies policy from time-to-time by posting a new version on the web pages.

20. Educational Applications

20.1 The School uses a school management information system (MIS) as well as different educational and learning platforms to complement teaching (cloud computing services). These platforms store and process sensitive data of parents, teachers and students strictly for internal and educational purposes.. The teachers request, prior to their use, authorisation from the School. Each authorisation request involves the assessment of the application from the point of view of data protection and information security as well as the subsequent authorisation or denial by the School.

20.2 All users of these school platforms have restricted access through convenient passwords. The use of such educational platforms does not at any moment affect the transmission of student data to the application's service provider so that they can use such data for their own purposes or store the data permanently. The school will always retain its right to access to student's data and its deletion when deemed appropriate.

20.3 These platforms are in strict compliance with the data protection legislation and assure the adoption of sufficient guarantees in case there is an international data transfer.



20.4 The use of such educational platforms does not at any time affect the transmission of student data to the application's service provider so that they can use it for their own purposes or store the data permanently. The school will always retain its right of access to data and its deletion when deemed appropriate.

20.5 This data protection policy is reviewed periodically to ensure compliance with Data Protection current regulations.