

School's Privacy Notice

INTRODUCTION

THE AMERICAN ACADEMY LARNACA (hereafter referred to as "the School" or "We") 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 are 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').

We are committed to using the personal data and we are responsible for the safe collection and processing of such data, always in full compliance with the General Regulation for the Protection of Personal Data of the European Union (Regulation 2016/679 - GDPR) and the applicable legislation in Cyprus governing the collection and processing of Personal Data of Natural Persons (L. 215(I)/2018).

This privacy notice gives detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please email your enquiries at DPO@academy.ac.cy

TYPES OF PERSONAL DATA WE PROCESS

We process personal data about prospective, current and past: pupils and their parents; staff, suppliers and contractors; donors, friends and supporters; and other individuals connected to our schools.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;
- education and employment data;
- images, audio and video recordings;
- financial information (e.g. for bursary assessment or for contract fulfilment);
- courses, meetings or events attended.

As educational institutions, we need to process special category personal data (e.g. concerning health, ethnicity, and / or religion), We do so in accordance with applicable data protection Regulation and Law (including with respect to safeguarding or employment) or by explicit consent.

PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

We process personal data to support the schools' operations and for:

- The selection and admission of pupils.
- The provision of education to pupils including the administration of the school curriculum and timetable; monitoring pupil progress and educational needs; reporting internally and to parents; administration of pupils' entries to examinations, reporting upon and publishing the results; providing references for pupils (including after a pupil has left);
- The provision of educational support and related services to pupils (and parents) including the maintenance of discipline; provision of careers and library services; administration of sports fixtures and teams, school trips; provision of the school's IT and communications system and virtual learning environment.
- The provision of educational/activity-based courses during summer holidays to students enrolled on such courses;
- The research into and development of effective teaching and learning methods and best practice
- Operational management including the compilation of pupil records; the administration of invoices, fees and accounts; the management of security and safety arrangements (including the use of the school's IT and communications systems); management planning and forecasting; research and statistical analysis; the administration and implementation of the schools' rules and policies for pupils and staff; the maintenance of historic archives and other operational purposes.
- The promotion of the schools through our websites, the prospectus and other publications and communications (including through our social media channels); and
- Maintaining relationships with Graduates and the wider school community by communicating with the body of current and former pupils and/or their parents or guardians and organising events.

The processing set out above is carried out to fulfil our legal obligations (including those under our parent contract and staff employment contracts). We also expect these purposes to form our legitimate interests.

COLLECTING, HANDLING AND SHARING PERSONAL DATA

We collect most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents and/or legal guardians). In some cases, we collect data from third parties (for example, referees, previous schools)

Appropriate members of staff process personal data held by us, for the purposes for which the data is provided.

Technical and Organisational Measures

We 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 school systems.

Transferring of data with Third Parties

We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as examination boards, the school's professional advisors and relevant authorities (e.g. the Ministry for Education and Social Insurance Department).

Some of our systems are provided by third parties, e.g. hosted databases, school website and school portal or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

HOW LONG WE KEEP PERSONAL DATA

We retain personal data only for a legitimate and lawful reason and only for as long as necessary.

Any personal data held by us for marketing and service update notifications will be kept by us until you notify us that you no longer wish to receive this information.

If you have any specific queries about our record retention periods or, wish to request that your personal data be considered for erasure, please contact DPO@academy.ac.cy

YOUR RIGHTS

You have the following rights under GDPR

- a Right to Access** – You have the right of access to your personal information that the school process 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 the correction of inaccurate information. 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 are no longer necessary in relation to the purposes for which they were 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.
 - 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 have been processed illegally.
 - v. If personal Data have to be erased for compliance with a legal obligation under EU law to which the School is subject.

- vi. If the personal data have 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 of residence, your place of work or place where you believe the School has infringed your right(s).

You always have the right to withdraw consent, where given, or otherwise object to receiving generic communications. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may exist under some form of contract or agreement with the individual (e.g., an employment contract).

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information, which is subject to legal privilege. We are also not required to disclose any confidential reference given by the school for the purposes of the education, training or employment of any individual.

CHANGE OF DETAILS

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. For any significant changes to important information, such as contact details held about you, please notify the administration or email the changes to DPO@academy.ac.cy

THIS POLICY

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with GDPR, you should notify us. You can also make a referral to or lodge a complaint with the Commissioner’s Office of Personal Data Protection although it is recommended that steps are taken to resolve the matter with us before involving them.

December 2022