

Dear Parents,

I thought you might like to know how ACE manages your data in line with GDPR. In light of the regulation some of our biggest challenges concern establishing contact between parents to enable such events as birthday parties and ensuring that we have the correct permissions in place in order for us to utilise images of the children within the school. With this in mind, I would ask you to read this document carefully and to submit the completed permissions form as soon as possible when you receive it.

You may be aware that from 25 May 2018, the rules around data protection were changed. The “General Data Protection Regulation” (GDPR) defines how we can use your and your child’s personal data and keep it safe as well as strengthening your rights over your own and your child’s data. Compliance with the regulation is an ongoing process. We publish and update policies and procedures that are compliant with the regulations and we keep you informed of these developments. The school has a lawyer from Claeys & Engels who specialises in Data Protection to advise and manage compliance with the regulation and to answer any questions that might arise.

You will find below a privacy notice for students and parents explaining why and how we collect personal data, how we protect this information, how long it is stored, as well as your rights in this respect.

If you have any questions about how GDPR affects you or your child please feel free to contact me and I will try to answer your questions.

Yours sincerely

Jackie Daire

Principal

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ACE of BRUSSELS is a registered Cambridge International School



ACE OF BRUSSELS - PRIVACY NOTICE FOR STUDENTS AND THEIR PARENTS

Introduction

ACE of Brussels (Academy for Collaborative Education of Brussels) ASBL, 1160 Auderghem (Brussels), Belgium (hereinafter: “**ACE**”, “**the school**” or “**we**”), processes personal data on its prospective, current and former students and their parents or legal representatives, as part of its everyday operations when providing educational services.

With regard to such processing, ACE will qualify as data controller.

In this capacity, ACE strives to comply with applicable data protection regulations, such as the European General Data Protection Regulation 2016/679 of 27th April 2016. This Privacy Notice (hereafter “**Notice**”) explains how we collect and use personal data, who we share it with and the ways in which we protect your privacy while doing so. This Notice applies to all personal data collected for and on behalf of ACE. This pertains to both information collected in analogue form (forms, documents, in writing) and through technological means, such as information systems and email.

ACE wishes to be completely transparent with regard to the processing of Personal Data and therefore, we have presented below all the information you may need on this subject.

Please take a little of your time to read this privacy notice to understand the data processing operations carried out by ACE.

1 The categories of personal data being processed

The categories of personal data that ACE collects and processes include:

- standard data related to your identity (such as surname, name and address)
- personal data (date and place of birth, nationality, gender, phone number, email address, hobbies and interest, etc.)
- parents emergency contact details (name, address, contact numbers, e-mail)
- educational and evaluation data (such as assessments, relevant medical information, special educational needs information, behavioural information, ...)
- attendance information (such as sessions attended, number of absences and absence reasons)
- special categories of data, such as medical and care plans (the details of your child’s medical and care needs are held in their classroom, in the office and on their main school file. Access is limited on a strict need-to-know basis. These medical and care plans are taken with your child on trips and outings)
- details of pupil’s special dietary requirements
- logging and audit in the use of IT systems and education technology apps, applications and cloud based systems
- communication and correspondence data (such as emails, letters and other types of correspondence)
- photographs and videos, if you give your consent through the specific consent form
- any other personal data (other than mentioned above) that require processing by virtue of the law.

The education services we provide require us to collect and process special categories of data, such as health information, for the purposes of safeguarding the protection of your children and the wellbeing of those within our care. We do not disclose or share special categories of data without

explicit and unambiguous consent unless we have to do so where we are required to by law, or where we have good reason in protecting the vital interests of an individual, or where not doing so would place someone else at risk.

With your consent, ACE can also process your or your children's picture, images or videos. These will be used within school for various purposes to support curriculum, health and welfare and safeguarding protocols. We will ask you to give your consent through a consent form. You can withdraw your consent at any moment, and in that case your picture will be immediately removed.

2 For which purposes do we use your personal data?

ACE collects personal data, including special categories of personal data of students and parents, to provide a safe and caring international environment for teaching, learning and general educational purposes.

More specifically we process your or your children's personal data for the following purposes, and other purposes that are compatible with those described below:

- to undertake and manage the school admissions and enrolment
- to provide a safe and secure learning environment
- to comply with child protection requirements
- to support and enable the academic and personal objectives of children, including the monitoring and reporting of progress
- to provide our educational services
- to manage registration for sport events (children's names and age are required for registration purposes, and consent will be obtained prior to the sports event if your child is attending)
- to provide additional health and support services (referrals to for example Educational, Psychology, Occupational Therapy, Speech and Language Therapy. Your consent will be obtained prior to referral)
- to protect the health of the students and staff we serve
- to provide a tailored learning environment and make evidence based education decisions for the children we serve
- to enable the children we serve to continue or progress their education at other educational organisations
- to support our employees in the performance of their duties
- for financial planning to help in the future planning and resource investment purposes
- to meet our statutory reporting requirements to the education and other authorities
- to help investigate any concerns or complaints you may have
- to make you aware and inform you about our services, news, events and activities that are undertaken at or in association with ACE
- to communicate with you within the framework of your relationship with ACE
- to ensure the safety and security, including camera surveillance
- for forecasting and planning for education service provision
- to respond to requests of our staff, (former) students or authorities regarding historic information pertaining to their time at ACE.

3 What are the legal grounds for which my personal data are processed?

We collect and use personal data to carry out the education services as described above. We do so under the lawful basis that the processing is necessary for the performance of a contract in which you are entering or have entered into.

In some circumstances we may have to process data for other purposes that are not necessary for the performance of the contract. In such cases, the processing may be based upon:

- our legitimate interests, such as providing a safe learning environment, financial planning, resource investment optimization, investigation of complaints, safety and security (including camera surveillance), maintaining the ACE community, etc.;
- the protection of you or your children's vital interests (e.g. emergency contact details, special dietary requirements, medical and care plans);
- the compliance with our legal obligations and/or;
- the consent you or your children may have provided to us (e.g. for pictures and videos, registration for sport events, additional health and support services or for sharing contact details with parents of other pupils, e.g. for the organisation of birthday parties).

4 How do we collect your personal data?

We may collect your personal data in a variety of ways:

- Personal data relating to you or your children can be obtained directly from you or your children, for example via completing the Enquiry Form, Enrolment Form, Health Form and via meetings with teachers and staff, etc.
- Personal data relating to you or your children can also be obtained via other information channels, such as previous schools, health professionals, special education needs professionals, etc.
- Personal data relating to you or your children can also be obtained via assessments, camera surveillance, etc.

5 Who will have access to my personal data?

Your personal data is shared internally within ACE for the purposes of delivering the services required.

For the purposes described in point 1 of this Notice, ACE may need to share your personal data externally with certain recipients, as well as with third parties processing your data on behalf of ACE. More specifically, this includes the following categories of recipients:

- Cambridge Assessment International Education (external examination body used by the school);
- Schools, colleges or universities that the students attend after leaving ACE;
- Local education authorities in Brussels;
- Nurses, doctors or social service organisations (amongst others where sharing is in the vital interests, or where not sharing could have a negative impact on the individual);
- The catering provider (Foodcademy, in order to meet health and dietary requirements);
- Parents of other pupils of ACE (e.g. to enable them to organize birthday parties);
- Providers of information systems that are necessary for ACE to deliver the admissions, administration, teaching and learning, and child protection services;
- Providers of IT hosting and maintenance services;
- Local authorities, government organisations, police, health and social care.

Moreover, for the purposes described in point 1 of this Notice, the service providers of the following tools can also need access to certain personal data of you or your children:

Tool	Description
Google for Education	Management of pupil information, and management of the school intranet and websites
Cambridge Assessment International Education	This organisation has an online assessment tool used by the school to assess pupil progress
Edupage	The school's timetabling system used to monitor pupil attendance
YUKI	The school's accounting/budget monitoring tool

6 Will my personal data be transferred outside the European Economic Area (EEA)?

Most of the processing of your personal data and those of your child will not involve any transfers outside the European Economic Area (EEA). However, it could be necessary that a company located in a third country outside of the EEA needs access to the personal data to process and/or store them. More concretely, we use several third party suppliers providing online programmes used as part of our education programme (such as Google for Education) and for monitoring the progress of children on specific learning programmes, all located in the United States. These US based suppliers are all affiliated to the EU-US Privacy Shield, providing an appropriate safeguard for these transfers and the protection of your personal data by these suppliers. Moreover, if you and your child would be relocated, we could transfer reports and information about your child to prospective new schools located outside of the EEA if you consent thereto.

7 How long is my personal data stored?

We keep personal data for as long as necessary with regard to the purposes described in point 2 of this Notice or for any other purposes that may be communicated to you. In general, we keep your personal data during the time you or your children are a student of ACE, as well as 10 years after they have left the school.

8 Will ACE make use of automated decision-making?

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals involved. As a rule, ACE does not make use of automated decision-making as described above.

9 What are my rights with regard to the processing of my personal data by ACE

Parents and students may exercise a number of rights with regard to the processing of their personal data vis-à-vis ACE.

The first point of contact in connection with the processing of personal data and the exercise of the rights described below is Mrs Jackie Daire (info@aceofbrussels.com). ACE shall respond to such requests and may or may not act upon them, in principle within a period of one month, all in accordance with applicable data protection legislation.

The rights which you may have under applicable data protection legislation are:

- **Right to object** – the right to object at any time to the processing for which ACE bases itself on the legitimate interest. ACE will then cease the processing unless it has compelling legitimate grounds for the processing.
- **Right to information and access** – to request access to and a copy of the personal data ACE holds on you, as well as the right to information about relevant aspects of the data processing by ACE (to the extent that this would not adversely affect the rights and freedoms of others). This Notice serves to inform you thereon but contact us if you have any questions.
- **Right to rectification** – to correct inaccurate personal data or to complete incomplete personal data.
- **Right to erasure** – to request the deletion or removal of personal data in specific circumstances, for example if your personal data is no longer necessary for the purposes pursued by ACE or if there is no longer a legal ground for the data processing.
- **Right to restriction of the processing** – if you were to object to the processing or to the accuracy of the processed data or if you wish to retain certain personal data in the context of a possible claim while ACE no longer needs the data in the light of the purposes mentioned under point 1 above.
- **Right to data portability** – to receive your personal data in a structured, commonly-used and machine readable format and to transmit it or have it transmitted to another international school, insofar we process them in an automated way related to the contract between us or your consent and insofar this does not affect the rights and freedoms of others, such as for example other students.

In addition, you also have the right - if you feel that ACE did not act in line with data protection legislation - to lodge a complaint with the Data Protection Authority.

Where the processing of your personal data is based upon consent, you and/or your child have the right to withdraw consent at any time. Such withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.

There may be instances where you may not want us to process or share your personal information. In these cases, we may not be able to fulfil the service you need, or do so in a limited way, or be able to comply with a statutory obligation. In those instances, we will not be able to comply with your request and we will tell you if this is the case.

10 **Who can I contact?**

For any questions or concerns relating to this Notice or the processing of your personal data by or on behalf of ACE, as well as for the exercise of any of the rights described in chapter 9 of this Notice, please contact the ACE Mrs Jackie Daire (info@aceofbrussels.com).

11 **Changes to this Privacy Notice**

We may edit this Privacy Notice from time to time, within the limitations set out by the relevant privacy and data protection laws.

This Privacy Notice was last updated in August 2021.