

ACE OF BRUSSELS WEBSITE PRIVACY NOTICE

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ABOUT THIS NOTICE

This Privacy Notice ("**Notice**") explains how we (as defined below) collect, share and use any information that alone or in combination with other information, relates to you ("**Personal Data**") when you ("**you**" and "**your**") use our website www.aceofbrussels.com (the "**Site**") as a visitor of our Site (including as an interested parent) or a job applicant. If you are a parent or a legal guardian of one of our students and you want to know more about how we process your child's personal data as part of our school activities, please review our Students and Parents Privacy Policy.

This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how can you exercise them.

For the purpose of this Notice, ACE of Brussels with registered office at Drève du Prieuré 19, 1160 and registered with the Crossroads Banks of Enterprises under number 0651.544.941, and with VAT BE0651 544 941 (the "**School**", "**us**", "**we**", or "**our**") acts as the data controller for the Personal Data we collect. As a data controller, ACE is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, and specifically with the General Data Protection Regulation.

Please take the time to read this Notice carefully. If you have any questions or comments, please contact privacy@aceofbrussels.com.

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1. WHAT PERSONAL DATA WE COLLECT, WHY AND FOR HOW LONG

Purposes for which we process your data	Categories of Personal Data we collect	Legal grounds for processing your data	Retention period
I am a website visitor and/or an interested parent			
<p>Managing requests submitted via our "new enquiry form" to receive information about our school</p>	<ul style="list-style-type: none"> • Contact details: name, email address, phone number; • Details about your child: name, date of birth, mother tongue, name of current school; • Other information provided in the content of your request/query 	<p>Our legitimate interest to respond to requests and to provide information about our school to interested parents or students</p>	<p>2 years</p>
<p>Managing online bookings and online payments to our additional services (such as ACE Space Sensory Room, Listening Program®, Intake sensory profile, etc.).</p>	<ul style="list-style-type: none"> • Contact details: first name and last name, email address, mobile number, address; • Details about your child: name of parent/legal representative, name of child, date of birth of child, allergies of child, mother tongue; • Other information you may provide: where did you hear about us, details of emergency doctor; • Financial data including bank card details and invoicing data. 	<p>Our legitimate interest to offer online services to our interested students and parents</p>	<p>10 years for tax purposes</p>
<p>For the performance, maintenance and security of our Site</p>	<ul style="list-style-type: none"> • Online navigation data • Data collected via cookies and other tracking technology 	<p>Our legitimate interest to maintain the performance, functionality, and security of our Site</p>	<p>1 year</p>

<p>Managing the parents' portal to our 'Academy for Collaborative Education'</p>	<ul style="list-style-type: none"> • User account details: username, password. • Online navigation data 	<p>Legitimate interest to give access to interested parents to our School portal</p>	<p>We store your user account details for as long as you are actively using your account. If you don't log into your account after a continued period of 6 months, we will ask you if you want us to keep your user account details. If you respond no, or in the absence of a response, we will delete your user account details after 3 months.</p>
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I am a job applicant

<p>To manage our recruitment process (including registering your application and creating your applicant's profile) and to contact you with any future job opportunities</p>	<ul style="list-style-type: none"> • Identification data: first name, last name; • Contact details: email, address, phone number; • Professional details: CV and motivation letter, scans of certificates (including qualified teaching status certificate if you are applying for a teaching post); • Work status: eligibility to work in the EU; • Position you are interested in • Possible interest for a temporary position • Availability for supply work • The way you heard about the school 	<p>Our legitimate interest to attract talents, recruit, and manage our hiring process</p>	<p>If your application does not result in a job offer, we will retain your Personal Data for a maximum period of 1 year after the end of the job application procedure.</p>
<p>To put in place necessary arrangements for future employment</p>	<ul style="list-style-type: none"> • Identification data: first name, last name; • Contact details: email, address, phone number; • Professional details: CV and motivation letter, scans of certificates (including qualified teaching status certificate if you are applying for a teaching post); • Work status: eligibility to work in the EU; • Position you are interested in 	<p>Contractual necessity to take steps prior to entering into an employment contract with you</p>	<p>Duration of the employment + 5 years.</p>

<p>Background checking and verification of a certificate of good conduct</p>	<ul style="list-style-type: none"> • Criminal record extract (Model 596-2 for positions related to education, psycho-medico-social guidance, youth assistance, child protection, youth work or the supervision of minors) which contains the following data: • Identification data: full name, place and date of birth; • Profession • Civil status: nationality • Contact details: address; • National number • Any past criminal convictions 	<p>Compliance with applicable laws (Art. 596, paragraph 2, of the Code of Criminal Investigation in Belgium)</p>	<p>We do not store any copies of criminal record extracts. We only consult them as part of our verification of conduct procedure. Your criminal record extract will be immediately returned to you at the end of the recruitment process.</p>
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3. WHO WE SHARE YOUR PERSONAL DATA WITH

We may disclose your Personal Data to the following categories of recipients:

- to our third-party service providers for purposes that are described in this Notice or notified to you when we collect your Personal Data. This may include disclosures to providers we use in connection with the services they provide us, such as IT software or services providers who support the management and maintenance of our Site.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights;
- to our advisors, legal representatives and similar agents in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;
- to any other persons if you have provided your prior consent to the disclosure.

4. HOW WE PROTECT YOUR PRIVACY

We will process Personal Data in accordance with this Notice, as follows:

- **Fairness:** We will process Personal Data fairly. This means that we are transparent about how we process Personal Data and that we will process it in accordance with applicable law.
- **Lawfulness:** We will process Personal Data only on lawful grounds.
- **Purpose limitation:** We will process Personal Data for specified and legitimate purposes and will not process it in a manner that is incompatible with those purposes, unless permitted by applicable data protection laws.
- **Data minimisation:** We will process Personal Data that is adequate, relevant and limited to what is necessary to achieve the purposes for which the data are processed.
- **Data accuracy:** We take appropriate measures to ensure that the Personal Data that we hold about you is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Personal Data is kept as accurate, complete and current as possible by informing us promptly of any changes or errors. You should notify us of any changes to the Personal Data that we hold about you (e.g. a change of address).
- **Data security:** We employ strict technical and organisational security measures to protect your Personal Data from access by unauthorised persons, against unlawful processing, abuse, damage, loss and destruction both online and offline. These measures include among others: instructions and training to relevant staff to ensure they are aware of our data protection obligations when they are handling Personal Data; organisational and technical restriction of the access to Personal Data on a strictly 'need to know' basis, and monitoring thereof; technological security measures, including passwords, fire walls, anti-virus software and encryption.

- **Limited Retention:** We keep your Personal Data in a form that allows us to identify you for as long as necessary to achieve the purposes for which we are processing your data and do not store your data for longer, unless we are required to do so in accordance with applicable laws.

5. TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE EU/EEA

As a general rule, our processing of your Personal Data does not involve any transfers of data outside the European Economic Area (EEA) and all of your Personal Data is stored on our servers in Belgium. Nonetheless, at times, we may need to share your personal data with third-party suppliers who may be located in a third country outside of the EEA. In such case, the School will adopt appropriate safeguards in line with the GDPR to ensure that your Personal Data remains protected in accordance with this Notice. When transferring Personal Data outside the EEA, we rely on the European Commission's Standard Contractual Clauses for transfers of Personal Data.

6. HOW WE COLLECT YOUR DATA

a. DATA WE OBTAIN FROM YOU DIRECTLY

We obtain personal data about you when you visit our Site and the applications offered on it, such as the 'new enquiry form' for interested parents or the 'vacancy application form' for job applicants.

b. AUTOMATED COLLECTION OF DATA

We may also collect certain information automatically from your device. Specifically, the information we collect automatically may include information such as your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Site, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Site, where they come from, and what content on our Site is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Site to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further in our Cookie Notice.

7. YOUR DATA PROTECTION RIGHTS

You have several rights concerning the Personal Data we process about you. In particular, you have the right to:

- access your Personal Data, and receive a copy of them;
- ask that we update the Personal Data we hold about you, or correct such Personal Data that you think is incorrect or incomplete;
- ask that we delete your Personal Data, or restrict the processing of your Personal Data, if certain conditions apply;
- withdraw your consent to our processing of your Personal Data (to the extent such processing is based on your consent). Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent ;
- receive your Personal Data, in a structured, commonly used and machine-readable format and to transmit such Personal Data to another party (to the extent the processing is based on consent or the performance of a contract);
- object to our processing of your Personal Data when such processing is based on our legitimate interest as a legal basis, in which case we will cease the processing, unless we have compelling legitimate grounds for the processing.

You may also contact the Belgian data protection authority at:

Belgian Data Protection Authority

Rue de la Presse 35

1000 Bruxelles

+32 (0)2 274 48 00

+32 (0)2 274 48 35

contact@apd-gba.be

www.autoriteprotectiondesdonnees.be

Note that if you are a parent or legal guardian, you may be entitled to exercise the above rights on behalf of your child to the extent that the child does not have sufficient understanding to exercise his/her rights or when it is in the child's best interest.

In order to exercise the above rights, please send an email to privacy@aceofbrussels.com or send a written request to ACE of BRUSSELS, Drève du Prieuré, Auderghem, 1160, Bruxelles.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

8. LINKING TO OTHER WEBSITES

The Site may include hyperlinks to websites owned and operated by third parties. Whilst we try to only provide links to sites that share our high standards concerning data protection, we are not responsible nor liable for the privacy practices of such third party websites and your use of such websites is at your own risk. When clicking on third party links on the Site, we strongly recommend you to first read the privacy Notices on the relevant websites before disclosing any Personal Data.

9. UPDATES TO THIS PRIVACY NOTICE

We may modify this Privacy Notice from time to time. To let you know when we have revised the Privacy Notice for the last time, we will amend the revision date at the top of this page for each modification. The modified Privacy Notice will then be applicable as from this date.

When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.

10. HOW TO CONTACT US

If you have any questions about this Privacy Notice, or if you wish to exercise your rights (or those of your child), you can contact us:

- by emailing us at privacy@aceofbrussels.com;
- by calling to: 0032 (0)2 420 02 04;
- by sending a written request to ACE of BRUSSELS SCHOOL, Drève du Prieuré 19, Auderghem, 1160 Bruxelles.