

ACE OF BRUSSELS

STUDENTS AND PARENTS PRIVACY NOTICE

Last date of revision: 22 November 2024

1. 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**"). This Notice applies to current and past students, as well as their parents or legal guardians ("**you**" and "**your**").

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 ("**GDPR**").

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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We do not process any Personal Data that may contain information relating to a person's race or ethnic origin, religious beliefs, physical or mental health or condition, sexual orientation ("Sensitive Personal Data"), except in certain circumstances, when we are required to do so by law or where the processing is necessary to protect the vital interests of the student. If we are not already permitted by applicable data protection laws to process your Sensitive Personal Data for the purposes it is required, then we will obtain your consent to our use of your Sensitive Personal Data. Where we ask for your consent, you have the right to decline to provide your consent and/or (if provided) to withdraw your consent at any time.....	
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2. 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 student (or former student)			
<p>Providing educational services to support student's academic and personal development, including monitoring and reporting progress.</p>	<ul style="list-style-type: none"> • Identification data: name, date of birth, nationality, gender, town/city of birth. • Contact details: email, phone number. • Personal characteristics: gender, mother tongue, languages spoken, nationality • Educational and evaluation data: linguistic competences, disciplinary information, academic records, examination scripts and grades, special education needs information, attendance information. 	<p>Contractual necessity to provide our educational services to you</p>	<p>Duration of the child's schooling + 10 years (statute of limitation for contractual claims under Belgian law)</p>
<p>School events, year books, postings on our website.</p>	<ul style="list-style-type: none"> • Photographs and videos 	<p>Consent</p>	<p>Duration of the child's schooling</p>

Managing student IT accounts (e.g., school programs, etc.)	<ul style="list-style-type: none"> • User account details: username, password. 	Contractual necessity to provide our educational services to you	Duration of the child's schooling + 10 years (statute of limitation for contractual claims under Belgian law)
Protecting the health and wellbeing of our students, including providing support and care for emotional and psychological wellbeing	<ul style="list-style-type: none"> • Health and wellbeing data: medical conditions, allergies, medications, special dietary needs, psychological assessments, or reports from healthcare professionals (where applicable). • Emergency contact data: contact details of parent or legal guardian, contact details of child's paediatrician 	Consent	Duration of the child's schooling + 10 years (statute of limitation for contractual claims under Belgian law)
Providing you optional services (e.g., lunch)	<ul style="list-style-type: none"> • Identification data: name, date of birth, nationality, gender, town/city of birth. 	Our legitimate interest to provide you with the optional services	Duration of the child's schooling
	<ul style="list-style-type: none"> • Food preferences: special dietary needs, allergies, choice of meal. 	Consent	
Responding to requests from former students or authorities regarding their time at ACE	<ul style="list-style-type: none"> • Educational and evaluation data: academic records, examination transcripts and grades. 	Our legitimate interest to provide you with a copy of your academic records and transcripts whenever you need	20 years after the end of the child's schooling after which it is archived
I am a parent/legal representative			

<p>Managing enrolment, administration of school fees, and processing of financial aid.</p>	<ul style="list-style-type: none"> • Financial data: bank account details, tuition fees, scholarship or financial aid information. • Contact details: name, phone number, email and address. 	<p>Contractual necessity to provide our educational services to your child</p>	<p>10 years for tax purposes</p>
<p>Providing you access to our School portal and IT systems (e.g., access to your child's school transcripts, etc.)</p>	<ul style="list-style-type: none"> • User account details: username, password. 	<p>Contractual necessity to give you access to our School portal and IT systems</p>	<p>Duration of the child's schooling</p>
<p>Communicating with you about your child</p>	<ul style="list-style-type: none"> • Communication data: emails and other written communications. 	<p>Legitimate interest to discuss your child's situation and to provide you with any information concerning your child</p>	<p>Duration of the child's schooling (+ 10 years (statute of limitation for contractual claims under Belgian law))</p>
<p>Providing you with our newsletters, and informing you about our school activities and events</p>	<ul style="list-style-type: none"> • Contact details: name, email address. 	<p>Our legitimate interest to inform you about our school activities and events</p>	<p>Duration of the child's schooling (unless you choose to unsubscribe from our newsletter)</p>

Complying with child protection requirements	<ul style="list-style-type: none"> • Identification data: name, email address (where applicable), data of birth, nationality, gender, languages spoken, country and town/city of birth, photograph. • Any other data that may be requested by public authorities (including health and wellbeing data) 	Legal obligation	Duration of the child's schooling + 10 years (statute of limitation for contractual claims under Belgian law)
Processing activities applicable to both students (or former students) and parents			
Ensuring safety and security (including CCTV surveillance)	<ul style="list-style-type: none"> • CCTV footage 	Our legitimate interest to protect and ensure the safety of our school premises	1 month (unless these images are used to provide evidence of an offence, damage or incivility or to identify a perpetrator, a public order offender, a witness or a victim. In such cases, the images may be retained for the duration necessary to conduct the investigation and any subsequent legal proceedings.)
Investigating complaints or concerns	<ul style="list-style-type: none"> • All Personal Data contained in your complaint 	Our legitimate interest to investigate and respond to your complaints and concerns	For the duration of the handling of the complaint + 10 years (statute of limitation for contractual claims under Belgian law)

We do not process any Personal Data that may contain information relating to a person's race or ethnic origin, religious beliefs, physical or mental health or condition, sexual orientation ("**Sensitive Personal Data**"), except in certain circumstances, when we are required to do so by law or where the processing is necessary to protect the vital interests of the student. If we are not already permitted by applicable data protection laws to process your Sensitive Personal Data for the purposes it is required, then we will obtain your consent to our use of your Sensitive Personal Data. Where we ask for your consent, you have the right to decline to provide your consent and/or (if provided) to withdraw your consent at any time.

3. WHO WE SHARE YOUR PERSONAL DATA WITH

If you are a student, we share your Personal Data with our staff members and your parents. If you are a parent or legal representative, we share your Personal Data with our staff members. Data processing activities will be handled only by staff members with a legitimate need to access the students and legal representatives/parents' Personal Data, for the purposes described above.

Additionally, 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 IT systems, food delivery companies or other suppliers of various schooling services.
- 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 minimization:** 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; organizational 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

We collect the personal data mostly directly from you but we may also collect some data from third parties, including referees, previous schools, and professionals or authorities working with you.

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 are 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. 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.

9. 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, Drève du Prieuré 19, Auderghem, 1160 Bruxelles.