

European Azerbaijan School



Data Protection Policy

Created and revised by the Director and Board of Trustees 18/08/2022

European Azerbaijan School

European Azerbaijan School (EAS) is committed to comply with the General Data Protection Regulation (GDPR) 2018 in protecting students and parents' personal information that has been processed by the school. This document informs you of the School's policy and practices on data privacy matters, before you provide your personal data to the School. The word "You" or any derivation thereof, as used herein refers to owner of the personal data, which include both the student and the parent/legal guardian of the child.

Data protection principles

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

How we use personal information

The school collects personal information and sensitive categories of personal information of students, parents employees and at times third parties, to provide a safe and caring environment for teaching, learning and general educational purposes. We use the information you provide for purposes that are necessary by law and required to undertake the performance of the contract into which you have entered and do so as we are required to do by law. We will always ensure we have a condition for processing personal and sensitive information

We use the information you provide in the following ways:

- to undertake and manage the school admissions and enrolment
- for approved school trips

European Azerbaijan School

- personal financial information (for the purposes of billing and payment of tuition)
- to provide a safe learning environment
- to comply with child protection requirements
- to support and enable the academic, pastoral and personal objectives of children, including the monitoring and reporting of progress
- to provide support and care for emotional and psychological wellbeing (pastoral and counselling)
- to protect the health of the students and staff we serve. We may also use data provided to safeguard staff and students
- to provide a tailored learning environment and make evidence-based educational decisions for the children we serve
- to enable the children we serve to continue or progress their education at other educational organisations
- to enable the development of a comprehensive picture of the workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to enable individuals to be paid
- to support and develop our employees in the performance of their duties
- for financial planning to help in the future planning and resource investment purposes
- to help investigate any concerns or complaints you may have

The categories of personal information that we collect, hold and may share include:

- personal information (such as name, date of birth, and address)
- special categories of data
- other relevant categories for the performance of our services (such as assessment, relevant medical information, special educational needs information, exclusions / behavioural information and psychological reports and assessments)
- attendance information (such as sessions attended, number of absences and absence reasons)
- logging and audit in the use of IT systems and education technology apps, applications and cloud based systems

Collecting student information

Whilst the majority of student information you provide to us is required for the performance of a contract or by law, some of it is provided to us on a voluntary basis.

In order to comply with data protection law, we will inform you when we require consent to process your information. Where consent is provided parents/guardians are free to withdraw consent at anytime.

Retention and storing of personal data

The school recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the

European Azerbaijan School

institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability.

All student and staff records will be stored securely at all times. Paper and electronic records will have appropriate security measures in place. This will ensure that confidentiality is maintained for student and staff records whilst enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.

Security

Whilst we store and use your personal data we will ensure the appropriate security of your personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Who do we share student information with?

Example of who we may share data with:

- Schools, colleges or universities that the students attend after leaving us
- Providers of information systems that are necessary for School to deliver the admissions, administration, teaching and learning, pastoral development, and child protection services
- Third parties for school trips

Processing and transfers to third countries

Personal information may be transferred to organisations outside Azerbaijan for the purposes of student application for college or university.

IT Systems

For the purposes of IT hosting and maintenance all school information including personal data is located at the school. No third parties have access to your personal data unless the law allows them to do so. Where the law allows and information is shared with third parties, we ensure they have the same protections in place as we do. We cannot deliver our education services without processing the data we collect and share.

Amendments to this policy

This Policy may be reviewed and amended periodically. We will communicate such changes along with the updated Policy on the School website: <https://www.eas.az> and/or other appropriate communication means as may be determined by the School. Parents and students are advised to visit the School website on a regular basis to check for any updates and changes on this Notice.