Maria International School of Bucharest

Resilience Respect Compassion Integrity Responsibility

Data Protection and Privacy Policy

Our Mission

We provide a learning experience and environment at Maria International that fosters creativity and excellence. Whilst providing supportive, stimulating and relevant lessons and resources within the context of the British style international curriculum.

Our school will be a caring place where adults and children are valued equally. Our aim is to create an environment where children and the whole school community will be inspired to be resilient, respectful, compassionate and act with integrity.

Our children will learn to respect themselves and others in an atmosphere of high expectations where they are nurtured and dare to make mistakes

We will strive to create opportunities for students to have a well-rounded school and learning experience, where they can develop critical thinking skills and work in collaboration with others.

Our Values

Resilience - We will handle adversity and problems with a mentality that enables us to keep going and do better.

Respect - We treat others with dignity, empathy and equality through our words and actions.

Compassion - We are kind, caring and will help everyone to be the best they can be.

Integrity - We are open, honest and act with good morals and ethics in all situations.

Responsibility - We ensure our own work, learning and duties are completed in a timely manner and to a high standard

Introduction

Maria International School of Bucharest (“MISB”) processes personal data on its prospective, current and former students and their parents or legal representatives, as part of its everyday operations of providing educational services.

MISB handles your personal data according to the General Data Protection Regulation no. 679 / 2016 applicable in the European Union (“GDPR”). For these purposes, MISB acts as a controller with regard to your personal data and the personal data of students (“Personal Data”), meaning MISB establishes the purposes and means of processing the Personal Data.

For the purposes of this Privacy Notice, please note that the term “processing” shall represent any operation performed on Personal Data, whether or not by automated means such as collection, recording, storage, adaptation, alteration, consultation, use, disclosure by any means, erasure or destruction.

MISB 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 matter.

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

Purposes For Processing Your Personal Data

MISB processes Personal Data that pertains to you or to the students for the following purposes:

- Provision of educational services: starting with the application process, enroling students, administration of classes and timetable, teaching activities, administration of internal and public examinations, assistance regarding the application process to various universities, and issuance of academic records.
- Provision of educational ancillary services: pastoral care, career and personal counselling, library services, extracurricular activities, school trips, managing school publications, setting up the virtual learning environment and granting access to MISB’s Intranet and Internet network as well as monitoring the use of MISB’s network.
- Ensuring campus security: monitoring access on campus, the performance of video surveillance.
- Provision of the medical care and counselling that students may need.
- School administration: handling student records and other academic documentation, administration of fees and accounts, internal audits and controls, reporting and statistics creation, implementing school policies, ensuring collaboration with other schools, archiving, assessing the quality of our services, facilitating research activities.
- School-related communications: conveying various messages related to the students and MISB’s activities by any communication means.
- Organizing fundraising activities and other school events (e.g., concerts, theatre productions, talent shows), including marketing communications related to the fundraising activities organized by MISB.
- Dispute resolution and litigations.

Categories of Personal Data that MISB processes, include, but are not limited to the following:

- Identification and contact information (first and last name, citizenship, country of birth, address, information included in IDs/passports, phone number, e-mail etc.); Bank details;
- Health data: medical history, allergies, immunization records, disorders, medical examination results and other medical data of the students;
- Data related to the educational background and regarding school performance of the students: academic, disciplinary or other educational related records, academic references, special needs, hobbies, results of educational diagnosis testing, test results, feedback, evaluations etc.;
- Behavioural data as well as data on preferences/interests of students;
- Family information: household information, language background, profession and workplace of parents etc.;
- Authentication and physical access data: e-mail, passwords, badge number, location data, other online identifiers, car details etc.;
- Photos and videos.

Generally, the Personal Data held by MISB were provided directly by the parents or resulted from the interaction the parents and the students have with the school. In some cases, third parties (e.g., representatives of former schools attended by students) supply data.

The lawful basis for the processing operations we conduct with regard to the Personal Data

MISB collects and further processes Personal Data, based on one of the following legal grounds, expressly laid down by the GDPR:

- The consent you have granted us, prior to any processing of the personal data, for:
    - the use of students' photographs and videos in various school publications, on MISB's website and social media pages;
    - the use of your contact details for direct marketing communications on MISB's fundraising activities;
    - other consents that may be granted from time to time for various processing activities.
- For the performance of the enrolment contract, as well as in order to take steps at your request for entering into the enrolment contract and to further provide the educational services.

Please note that there are some mandatory categories of personal data necessary for MISB in order to conclude the enrolment agreement and provide educational services to students at a high standard and in the best interest of the students.

The mandatory categories of personal data are included in the application form, which you have filled in online and listed in the enrolment contract you already have / will sign with MISB. All the categories of data that are compulsory for contract conclusion are marked accordingly in the application form.

Please take into consideration that all the mandatory categories of data are necessary for MISB to be able to evaluate your application and finally enrol your child. Failure to provide all the information marked as mandatory will lead to the impossibility of MISB to process your application and enter into a contract with you.

- A legal obligation that requires MISB to process your Personal Data (e.g. performance of video surveillance).
- For the performance of a task carried out in the public interest, considering that MISB provides educational services, regarded as a service of public interest, according to the Romanian applicable provisions on education, many processing operations conducted by MISB that are strictly related to educational purposes will be founded on this lawful basis for processing. We refer here mainly to:
    - issuing and storing academic records, evaluating students' performance etc.

The legitimate interest pursued by MISB

MISB relies on this legal ground in order to provide the educational services it has committed to deliver and additional services related to this scope at the highest standards, always for the benefit of the students and without outweighing the parents' or the students' rights and liberties.

MISB may invoke the legitimate interest legal ground in the following cases:

- Monitoring use of the MISB's virtual learning environment and network, including monitoring the use of the e-mail account provided by MISB;
- Conducting fundraising activities, including marketing of such activities;
- Enforcement of legal claims, addressing complaints and third party controls;
- Management, control, reporting and performing statistics on school's activity;
- Ensuring security;
- Maintaining close relationships with alumni and MISB's community;
- Collaboration with other schools and educational institutions;
- Performance of agreements with suppliers, including insurance suppliers;

- access to grants and other funding sources.

With respect to the processing of the special categories of personal data under the GDPR, respectively health data, please take into consideration that MISB processes health data based on the following legal grounds:

- The necessity of the Medical Office to process such data for the purpose of preventive and occupational medicine, medical diagnosis and the provision of health or social care or treatment on the basis of European Union or national law;
- Processing is necessary for reasons of substantial public interest, on the basis of European Union or national law. Such a legal ground is used especially in those situations where the school has to assess the learning capacity of a student and adapt the teaching activities to the special needs of a student.
- The explicit consent granted by you for the disclosure of the personal data of students related to the allergies they suffer from.

Disclosure of Personal Data

MISB discloses your Personal Data only to those members of MISB, staff and collaborators, who need access to the personal data mainly for ensuring the provision of educational and ancillary services. In this respect, please take into account that only the Medical Office has access to the students' medical records. Other departments of the school have access to specific health data based on the consent you have expressed (i.e. for allergies) or in order to protect a substantial public interest based on Union or national law (e.g., various medical conditions triggering special learning needs).

With respect to the disclosure of your Personal Data to third parties, outside MISB, please note that such disclosure is performed solely in the regular activity of the school. The categories of recipients include the following:

- IT providers, including educational applications, online tools, server hosting suppliers etc.
- Other educational institutions or organizations, not limited to other schools;
- Travel agencies, catering and transportation providers;
- MISB's photographer and video crew;
- Courier services providers;
- Utility services providers;
- Public authorities and institutions, national or foreign, judicial courts and foreign embassies or other forms of diplomatic missions;
- Tax, legal and accounting consultants.

Retention of Personal Data

MISB holds all your Personal Data for as long as you are in a contractual relationship with us, and afterwards for a standard period of 2 years, the period for which MISB can justify a need in storing such personal data. MISB keeps the student file and all the data related to the student interaction with MISB mainly for the scope of assessing the school's activity and the quality of services provided but also for addressing potential requests of students with regard to their school trajectory within MISB, which usually appear after the students have graduated.

Notwithstanding the retention period mentioned above, please be informed, that all the academic records and other documents related to study activities are kept for an indefinite period of time, according to the legal obligations that MISB has in this respect. Moreover, in any case, where a legal provision imposes a minimum retention period, MISB will keep the Personal Data for at least that mandatory period.

Your rights related to the processing of Personal Data by MISB

The GDPR provides certain rights related to the processing of personal data, that both you and the students have. In this respect, please be informed that students that have an appropriate level of understanding could exercise the rights listed in this section, individually.

MISB respects all the rights mentioned under the GDPR and is committed to furnishing the appropriate means by which you can exercise these rights, according to the details mentioned below:

- The right of access entails your possibility to obtain confirmation from MISB whether your Personal Data is being processed by MISB or not, and if the case maybe you are entitled to solicit access to this data, as well as additional information regarding the Personal Data, such as the purposes of the processing, the categories of recipients the Personal Data are being disclosed to and the envisaged retention period. In the situations where you may need to exercise the right of access, please consider contacting MISB. Please consider that there might be specific situations that are exempted from the right of access, such as information that identifies other individuals or which is subject to confidentiality obligations.
- The right to rectification, allows you to request MISB rectification of any inaccurate Personal Data that MISB may hold, as well as to have your incomplete Personal Data to be completed.
- The right to erasure means that in situations expressly regulated by law, you may request the erasure of your personal data. Please take into account, that the cases where the law provides for the possibility of erasure of personal data amount to the

situations where the processing is unlawful or where the processing is based on your consent, and you have withdrawn such consent.

- The right to restriction of processing, signifying your right to obtain restriction of processing your Personal Data from MISB's part. Please bear in mind that this right can be exercised only in specific situations laid down by the GDPR such as when you challenge the accuracy of your Personal Data. During the period necessary for us to rectify your data, you may ask us to restrict the processing of your Personal Data.
- The right to data portability implies your right to receive the personal data in a structured, commonly used and machine-readable format and further to transmit such data to another controller. This right to data portability shall be applicable only to the personal data you have provided to us and where the processing is carried out by automated means based on your consent or for the performance of the contract you have concluded with MISB.
- The right to object to the processing of your Personal Data by MISB, on grounds relating to your particular situation. The right to object applies to situations where MISB relies on consent as the legal basis for processing (e.g. using your e-mail address for conveying fundraising-related messages).
- The right to lodge a complaint designates your right to challenge the manner in which MISB performs the processing of your Personal Data with the competent data protection authority.
- The right to withdraw your consent is given for various processing operations, in cases where the consent represents the lawful basis for processing. In cases where you withdraw your consent to processing your Personal Data, please note that the processing will end from the moment the withdrawal takes place without any effect on the processing that took place prior to such withdrawal.

Video Surveillance

MISB has implemented a video surveillance system on the campus, in order to ensure the security of its students, staff and all the other persons that enter our premises. The security and well-being of our students is our primary concern and these video cameras allow us to offer real time protection.

Review and Evaluation

This policy is to be renewed, evaluated and appropriately updated annually by the Maria International leadership team and Head Teacher.

Date of next review: 15/08/2025

Prepared/Updated by: Yara Barsoum **Date**: 19/11/2024

Approved by: Nicholette Vicol **Date**: 22/11/2024

This policy is to be reviewed annually and updated as and when relevant changes occur.