



King's Group

SCHOOL DATA PROTECTION POLICY KING'S COLLEGE SCHOOLS SPAIN

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KING'S COLLEGE SCHOOLS

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1. SCOPE AND PURPOSE

1.1. *Scope*: This Policy applies to all KING’S COLLEGE SCHOOLS SPAIN (also referred throughout this document as “the Schools”, “the data controller” or “We” indistinctively), that have as one of the main values the privacy and confidentiality of all people, especially those whose personal data we process. Within that commitment, the protection of our students’ personal data is essential.

In accordance with the provisions above, the purpose of this policy is to give you information about what, how and why we collect your personal information, how we may use that information and with whom we may share it and why. Our Privacy Policy also describes the measures we take to protect the security of your information. We also tell you how you can contact us to get answers to questions you may have about our privacy practices and how you can exercise your rights over your personal data.

Our Schools are strongly committed to compliance with the General Data Protection Regulation (EU) 2016/679 of April 27, 2016 regarding the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and the Spanish Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights (LOPD), as well as the rest of the applicable legislative bodies in matters of child protection and education among others.



It goes without saying that the Schools are committed to the protection of minors, and watches at all times for the safeguarding of their interests.

The Schools must comply with privacy legislation and this policy. This policy will be regularly reviewed and updated to take account of new laws in force, new technologies and the changing of the Schools' environment when required. Please ensure you have read the current version of this policy.

1.2. Purpose: This policy is intended to provide information to parents/guardians and students as well as board members, employees, interns, volunteers, contractors and people visiting the Schools' site.

It describes the type of information that the Schools collect, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

Every School is the Data Controller as they process personal data about current, past and prospective students and their parents, legal representatives or guardians (referred to in this policy as "*parents*") as well as the subjects mentioned above and third parties who, with their consent, communicate their personal information.

The Schools' staff, parents and students are all encouraged to read this data protection policy and understand the Schools' obligations to its entire community.

This data protection policy also applies in addition to the Schools' other relevant terms and conditions and internal and external policies, including any contract between the Schools, staff, parents of students (and students themselves over age of legal competence), safeguarding and internal policies like retention of records policy, the Schools' policy on the use of cameras and images at the Schools, social media policy, safeguarding policy, exams policy, data protection policy for employees, policy on the use of CCTV or biometric data, policies of confidentiality and privacy, information security policy, ICT policies and health and safety policy, among others, including how concerns or incidents are recorded.

2. TERMS & DEFINITIONS

1. **Personal Data:** Any information related to an individual or '*Data Subject*', that can be used to directly or indirectly identify the person. This can be anything from a name or address to a photograph, voice or banking details and includes one or more factors related to someone's health and economic, cultural or social identity.

2. **Minor:** A data subject under the age of full legal responsibility related to data protection and especially the legal age to consent. Under the LOPD, the legal age to consent in Spain is *14 years old*.

3. **Data Subject:** Is any physical individual whose personal data is being collected, held or processed.

4. **Data Controller:** Any organization, person, or body that determines the purposes and means of processing personal data, controls the data and is responsible for it, alone or jointly.

5. **Data Processor:** A data processor processes the data on behalf of the data controller. Examples include catering services, school transport, psychological services, extracurricular classes, etc.

6. **Consent:** Is any "*freely given, specific, informed and unambiguous*" indication of the individual's wishes by which the data subject, either by a statement or by a clear affirmative action, confirms



agreement to the processing of personal data by the data controller for one or more specific purposes.

7. **Data processing:** Is any operation performed on personal data, such as collection, storage, transfer, modification, deletion, etc., whether or not by automated means.

8. **Personal information:** Is any information related to an identified or identifiable natural person and that is recorded in any form. For example, a person's name, address, phone number and age. Pseudonymised information about students can also be personal information

9. **Biometric Data:** Personal data that results from specific data processing related to physical and behavioural features of a person, which allows the identification of that person (e.g., fingerprints).

10. **Genetic data:** data related to a natural person's genetic characteristics, whether inherent or acquired, which offers information about the mental or physical health of that person.

11. **Data concerning health:** personal data referring to the personal mental and physical health of a person, including information on health services accessed.

12. **Sensitive personal data:** data relating to religious or other beliefs, sexual orientation, health, race, ethnicity, political views, trade union membership, criminal record, etc.

13. **Data Protection Officer (DPO):** is a role required by GDPR and LOPD with formal responsibility for overseeing a company's data protection strategy and its implementation to ensure compliance with the legal requirements.

14. **Data Protection Authority:** it is a national authority responsible for the supervision of the implementation and protection of data and privacy as well as implementing and enforcing data protection Law. In Spain is Agencia Española de Protección de Datos ("AEPD").

15. **Pseudonymisation:** the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

16. **Profiling:** any automated processing that uses personal data to evaluate certain personal aspects and predicts future actions and aspects relating to an individual, or to analyse or predict in particular that person's performance at work, economic situation, location, health, personal preferences, reliability, or behaviour.

17. **Representative:** a natural or legal person appointed by the data processor or controller to represent him with respect to the obligations under the regulation. It can also refer to a person which acts on behalf of the data subject, e.g., legal tutor of a minor.

18. **Third party:** is any natural or legal person, public authority, agency, or any other body other than the data subject, the controller, the processor, and the persons who, under the direct authority of the controller or the processor, are authorised to process data.

19. **Legitimate interests:** are referred to the rights and freedoms of those individuals which could be affected by the data processing carried out by a company or organisation. The purposes of the data processing must be based on legal ground.

20. **Rights of the data subjects:** Data subject rights is regulated in Cap.III of GDPR, articles 12 to 22 and LOPD Cap.II, articles 11 to 18 referred to right of access, rectification, opposition, deletion ("*right to be forgotten*"), limitation of processing, portability and not to be subject to individualised decisions

21. **Parental responsibility:** means the legal rights, duties, powers, responsibilities and authority a parent has for a child and the child's education. A person who has parental responsibility for a child has the right to be informed and make decisions about their academic information, care and



upbringing. Important decisions in a child's life must be agreed with anyone else who has parental responsibility.

3. DATA PROTECTION PRINCIPLES AND CONSENT

3.1. **Principles:** The Article 5 of GDPR and LOPD in Title II set up eight enforceable principles that must be adhered to at all times:

1. **Lawfulness, fairness and transparency (article 6 GDPR):** the School acts in compliance with the legal requirements and always provides transparent and clear information to the individuals about the type of data and the reason for its collection. Transparency means *"concise, transparent, intelligible and easily accessible form, clear and plain language"*;
2. **Purpose limitation:** the Schools only collect personal data for a specific purpose as long as necessary to complete that purpose;
3. **Data minimisation:** the Schools only process the necessary personal data to achieve its processing purposes;
4. **Accuracy:** the School takes the measures to ensure that the personal data is accurate and updated, having regard to the purposes for which it is processed, and corrects it if not;
5. **Storage limitation:** the School deletes personal data when it's no longer necessary;
6. **Integrity and confidentiality:** the Schools counts on the appropriate technical and organisational safeguards that ensure the security, integrity and confidentiality of the personal data. Personal data shall be kept secured and protected by the technical and organisational measures which ensure an appropriate degree of security, integrity, confidentiality and privacy;
7. **Accountability:** the Schools is responsible to comply with the GDPR and LOPD requirements and of the ability to demonstrate it. The Schools shall sign a data sharing agreement when we are sharing personal or other sensitive data with other parties involved in any data sharing activities.

3.1. **Consent:** The Schools will need consent from parents or students over legal age (in Spain, over 14 years) for to collection, use or disclosure of personal for the educational purposes. The Schools will take into account both the sensitivity of the personal information and the purposes for which the Schools will use the information.

We will ensure that the consent collected in informed, freely given, clear and express, always providing "opt-out" options or easy withdrawal. Upon notice of such withdrawal of consent, the Schools will notify the individual of the likely consequences and, except where otherwise necessary, required or permitted by law, the Schools will stop collecting, using or disclosing the personal information as requested.

4. LAWFUL BASIS FOR COLLECTING AND PROCESSING



The Schools collect and process information are the following:

- **Contractual relationship:** This basis applies in student admission and enrolment management, provision of educational, academic, nursing, safeguarding and related services, sending informative communications about educational matters, management and/or billing communications related to the educational activity itself, administrative and billing management necessary for the provision of the aforementioned services;
- **Compliance with a legal obligation:** Control and management of student medical records, provision of documentation to the relevant competent authorities for the defence or filing of legal actions;
- **Our legitimate interest:** Realisation of statistics or having statistical information from our Schools, carrying out satisfaction surveys, or sending commercial communications about our activities, always together with your consent;
- **Consent of parents / legal tutors or students over 14:** Sending commercial communications, including by electronic means, capture and use of images and videos to disseminate the student's participation in Schools' activities, or for promotional campaigns.
- **Vital interests of the data subject or of other persons:** If we are defending health, life, or minors' interests, we will take the corresponding actions.

5. WHAT INFORMATION DO WE COLLECT?

The Schools collect the following type of information:

1. **Information about students, their parents or tutors and their representatives, provided directly by them or their authorised persons:** Identification and contact details, educational background, health and behavioural information, familiar status, employments or personal situation, finance and bank account details among other that may be necessary to provide the educational services.
2. **Information about employment:** It is related to job applicants, staff members, interns, volunteers, visitors, contractors, customers, advisors as well as those of its affiliates and third-party agents engaged in supporting the Schools' business, provided directly by them or their representatives;
3. **Information about third parties:** It is related to potential students or clients interested in the Schools' services and who provided their consent to the processing of their data for the purposes set forth in this policy.

6. HOW DO WE COLLECT YOUR PERSONAL DATA

- a. **Personally and over the phone:** From parents, students or their legal tutors, and their family, staff, visitors, contractors, job applicants and others;



- b. From electronic and paper documentation: Including job applications, emails, invoices, enrolment forms, letters to the Schools, medical forms, consent forms (for example: enrolment, extracurricular activities, etc), our school's websites or the School controlled social media;
- c. Online tools: Such as apps and other software used by the Schools;
- d. Information collected through our websites: Cookies, online forms, emails.
- e. Photographs or other audio-visual contents for educational or commercial purposes with due information and consent of the data subject;
- f. CCTV cameras located at our schools;
- g. Geolocation integrated systems in means of transport (if applicable in each school);

7. PURPOSES TO PROCESS YOUR PERSONAL DATA

7.1. Personal data: In order to carry out ordinary duties to staff, students and parents, the Schools may process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation. Some of this activity needs to be carried out in order to fulfil their rights, duties or obligations, including those developed under a contract with their staff, parents or students themselves if they are emancipated.

Other uses of personal data will be made in accordance with the Schools' legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data. The Schools expect that the following uses may fall within that category of "*legitimate interests*":

- 1. For the purposes of student selection (and to confirm the identity of prospective students and their parents);
- 2. To provide education services, physical training or spiritual development, career services, extra-curricular activities and monitoring students' progress and educational needs;
- 3. To provide school transport services, catering, specialised care, etc;
- 4. Maintaining relationships with *Alumni association* and the School community, including direct marketing or fundraising activity;
- 5. For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- 6. For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- 7. To enable relevant authorities to monitor the Schools' performance and to intervene or assist with incidents as appropriate;
- 8. To give and receive information and references about past, current and prospective students, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past students;
- 9. To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the Schools;
- 10. To safeguard students' welfare and provide appropriate pastoral care;



11. To fulfil the Schools' contractual and legal obligations;
12. To monitor (as appropriate) use of the School's ICT and communications systems
13. To make use of photographic images of students in the Schools' publications on the School's website and (where appropriate) on the Schools' social media channels;
14. For security purposes, including CCTV;
15. Besides the aforementioned uses, regarding the Schools' staff for the selection and recruitment, processes, professional background, assessment of suitability and qualification for the position, criminal records, hiring, payroll, entries and removals in the personnel registers, etc.;

And

16. Where otherwise reasonably necessary for the Schools' purposes, including to obtain appropriate professional advice and insurance for the Schools.

7.2 Sensitive data: In addition, the Schools may need to process a special category of personal data (concerning health or religion) or criminal record information in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of School trips;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example Disclosure and Barring Service (DBS) checks, welfare or pension plans;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to follow the legal obligations and duties of care.

8. YOUR RIGHTS IN DATA PROTECTION

The Schools holds the appropriate data protection policies, procedures and training to implement your data subject's rights according to the legislation. Your rights as data subjects are the following:

1. **Right of access:** You can request access to your personal data;
2. **Right to rectification:** You have the right to obtain from the data controller without undue delay the rectification of inaccurate personal data. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement;
3. **Right to erasure (or "right to be forgotten"):** You have the right to obtain from the Schools the erasure of personal data if one of the following grounds applies: (a) your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;(b) you withdraw your consent on which the processing is based and where there is no other legal grounds for the processing;(c) you exercise your right to object to the processing and there are no overriding



legitimate grounds for the processing; (d) your personal data has been unlawfully processed; (e) your personal data has to be erased for compliance with a legal obligation; (f) your personal data has been collected in relation to the offer of information society services (online shopping);

4. **Right to restriction of processing:** The Schools will implement and maintain appropriate procedures to assess whether your request to restrict the processing of your data can be implemented. Where the request for restriction of processing is carried out, then the School will write to you confirming that the restriction has been implemented and when the restriction is lifted;

5. **Right to data portability:** The Schools process your personal data because there is a legal basis for the processing. Where the Schools have collected your personal data by consent or by contract, then you have the right to receive the data in electronic format or to give the file to another data controller.

6. **Right to object:** You have the right to object to the processing of your personal data in specific circumstances. Where such an objection is received, the Schools will assess each case on its merits;

7. **Right not to be subject to automated decision making:** You have the right not to be subject to a decision based solely on automated processing, where such decisions would have a legal or significant effect concerning you. At present there is no automated processing within the Schools. If in the future such processing is undertaken, the Schools will ensure that where systems are implemented, an appropriate right of appeal is available to you;

8. **Right to complain:** If you are not satisfied with our response to your request, you would like to discuss anything regarding this privacy notice, or you believe we are processing your personal data disregarding the data protection regulations in force, any claim can be sent to our DPO dpo@kingsgroup.org or to the Spanish data protection authority, Agencia Española de Protección de Datos (AEPD) with contact details described at <https://www.aepd.es/es/la-agencia/donde-encontrarnos>.

9. **Right to withdraw your consent:** You have the right to withdraw your consent freely and at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;

You can exercise your rights by sending a written request and a copy of your passport or ID number in order we can identify you to: dpo@kingsgroup.org.

The Schools will reply to your request without undue delay within one month from the receipt of your request according to the legal terms.

9. TRANSFER OF INFORMATION BETWEEN OUR SCHOOLS

When a student has been accepted at, and is enrolling to another school, the Schools transfer information about the student to that new school. This may include copies of the student's school records and health information.

This enables the new school to continue to provide the services for the education of the student, to support the student's social and emotional wellbeing and health and to fulfil legal requirements among other obligations.

As the Schools are integrated into the INSPIRED international network of schools, it is possible for the student to study at any of the group's schools, so data communication between the centers will



be necessary, including international data transfer if appropriate, within the legal conditions.

10. STORING AND SECURING INFORMATION

The Schools shall use the appropriate technical and organisational measures to ensure the security, confidentiality, integrity and privacy of the personal data, preventing from unauthorised access or unlawful processing against accidental loss, destruction or damage of the files.

11. UPDATING YOUR INFORMATION

The Schools endeavour to ensure that the information that we process is always accurate, complete and up to date. To update your information, please contact the Human Resources department, Finance department, Admissions and Administration departments.

12. SHARING YOUR INFORMATION

The Schools will only share your information with third parties on a *need-to-know basis* and with your consent except in cases relating to legal requirements, safeguarding of children, criminal activity, or if required by legally authorised bodies (e.g., Courts, police, social services, etc). If we decide to share information without parental consent and strictly under the cases stipulated by Law, we will record this in the student's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the students in our care.

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the daily operation of our business, for example to run our payroll and accounts, legal advisors, etc. Any such third parties comply with the GDPR and LOPD.

13. PARENTAL RESPONSIBILITY

In cases of shared parental rights, regardless of who has legal custody, both parents have the right to receive the same information about the circumstances that occur in their child's educational process, which obliges the Schools to guarantee the duplication of the information unless a judicial resolution is provided that establishes the deprivation of parental rights to any of the parents to some type of criminal measure prohibiting communication with the minor and / or his/her family.

All conflicts that could arise between parents in this regard must be brought before a family and juvenile court.

Parents will have the right to access to the academic and educational information of their children, even if they are of legal age or emancipated, as long as they incur alimony or education or food expenses, in which case the legitimate right of information of the parents will prevail on the privacy rights of the student of legal age or emancipated.



14. SENDING COMMERCIAL COMMUNICATIONS

The Schools may send you information or materials such as prospectuses, leaflets, newsletters, etc by e-mail or postal mail under your consent when you submit your postal or email address via Website. By ticking the box in the corresponding consent form, you are authorising to the Schools the sending of such commercial information or materials.

You can also authorise or unauthorise the communication of your data for the same purposes among other Inspired Schools.

You can withdraw your consent at any time, so if you do not want to receive promotional information, please send an email with your name, and surname, a copy of your ID number, your mailing address and your request to dpo@kingsgroup.org. As soon as we receive it, we will take reasonable steps to remove your name from such lists.

15. CONSENT TO USE YOUR IMAGE

Our Schools emphasise the importance of celebrating pupil success and as such photos and videos of our pupils are often used to showcase their skills and talents, as well as the day-to-day life of the schools.

The Schools are committed to the protection of the image of our students and we take compliance with data protection regulations very seriously, especially regarding consent to the publication of audio-visual contents and the protection of confidentiality and privacy of our students, staff and other people who may appear in our publications.

At the beginning of the school year, the School requests authorisation to share the students' audio visual contents on the School websites, marketing, social media channels, press and extracurricular activities. Students of legal age can give their consent by themselves without parental authorisation without prejudice to parental supervision.

The Schools will never disseminate any photograph or video without the parents or data subject's previous consent.

The Schools have an official photographer who attends special events at the Schools and who is also compliant with the GDPR and LOPD requirements.

On the other hand, although it is allowed for parents to take pictures of their children in special and organised events and celebrations within the schools facilities, the School is not responsible for the use that parents make of the images nor for claims of third parties that may appear in the photographs of the parents without their consent.

In addition, the Schools do not authorise the use of the contents of its publications by third parties nor is reliable for the responsibilities that may arise for these third parties from these unauthorised uses.



In cases in which the student's image will be used for specific advertising purposes, the Schools, through the central marketing services, will send parents the corresponding information about the use of the images and its duration as well as a sample of the photographs to be used, ensuring your consent. Similarly, your consent will be collected annually for the taking and use of your child's image for the Schools' yearbook.

In relation to the activities carried out outside the school, the consent of parents or students with legal age is required when these activities are not carried out in the exercise of the educational function. When the recording or taking of photos is done by third parties, that is, by those responsible for the activity or institution that is visited by the students, it will be the obligation of these third parties to obtain the consent through the Schools.

Finally, in order to preserve the safety and privacy of students and parents in the Schools' facilities, it is strictly forbidden to record videos or take photographs within the facilities except in specific organised events or circumstances in which it is permitted and with the limitations set forth above.

16. PERIOD OF RETENTION

Personal information will only be retained for the period of time required to fulfil the purpose for which it was collected. Once the personal information is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

17. DATA ACCURACY AND SECURITY

The Schools will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Schools at least on an annual basis of any changes to information held about them. Responsibility for changes in information relating to students rests with the parents.

The data subject has the right to request that any inaccurate or out-of-date information about them is erased or corrected.

The Schools will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to the School's systems. The School personnel will be made aware of this policy and their duties under the data protection regulations and receive relevant training.



18. COOKIES USED IN OUR WEBSITES

The Schools' websites track web browsing patterns to better understand how our website is being used. This generic information is collected through the use of session cookies. The cookies used by our websites are associated with an anonymous user and their computer, and they are not related to the user's personal data.

The cookies used in our websites are all temporary, with the sole purpose of making future transmission more efficient. In no case will the cookies be used in order to collect personal data.

IP ADDRESSES

The websites servers will automatically be able to detect the IP Address and domain name used by the user. All of this information is collected in a file about server activity that allows subsequent processing of data with the aim to collect statistical measurements only, which show the number of printed pages, the number of visits to web services, the reasons of the visit, the point of access, etc.

SECURITY

The websites use information security technologies which are accepted throughout the industry, such as *Firewalls*, methods to control access and cryptic mechanisms. All of these have the objective of preventing unauthorised access to the data. In order to carry out these purposes, the user/ client accepts that the provider collects data for purposes of authentication for access control.

19. EDUCATIONAL APPLICATIONS

The Schools use a school management information system (MIS) as well as different educational and learning platforms to complement teaching (cloud computing services). These platforms store and process sensitive data of parents, teachers and students strictly for internal and educational purposes. The teachers request, prior to their use, authorisation from the Schools. Each authorisation request involves the assessment of the application from the point of view of data protection and information security as well as the subsequent authorisation or denial by the Schools.

All users of these platforms have restricted access through convenient passwords.

The use of such educational platforms does not imply at any moment the transmission of student data to the application's service provider so that they can use such data for their own purposes or store the data permanently. The school will always retain its right to access to student's data and its deletion when deemed appropriate.

These platforms are in strict compliance with the data protection legislation and assure the adoption of sufficient guarantees in case there is an international data transfer.



The use of such educational platforms does not imply at any time the transmission of student data to the application's service provider so that they can use it for their own purposes or store the data permanently. The school will always retain its right of access to data and its deletion when deemed appropriate.

This data protection policy is reviewed periodically to ensure compliance with Data Protection current regulations.