

CAYMAN INTERNATIONAL SCHOOL



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Review Date: May 2019

Next Review: May 2020

Data Protection Policy

Cayman International School

ABOUT THIS POLICY

Cayman International School (CIS) 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.

PURPOSE

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the General Data Protection Regulations 2018, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

DATA PROTECTION PRINCIPLES

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

- (a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- (b) 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;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) 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;
- (e) 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;
- (f) 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.

GENERAL STATEMENT

The school is committed to maintaining the above principles at all times. Therefore the school will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
- Ensure our staff are aware of and understand our policies and procedures

SOURCE OF YOUR PERSONAL DATA

This information is gathered to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the school fulfills its obligations.

Most, if not all, of your personal data was obtained from you directly, either from the following sources or from any other information you provided and this may include:

- Various type of Application and/or Registration Forms;
- All other School and/or support services related Request Forms;
- Previous qualification related documents and/or certificates

In some instances, your personal data may have been obtained from external sources including, but not restricted to the following:

- From third parties such as previous educational institutions, law enforcement agencies and other government entities;
- Third party service providers and any other future third parties in relation or incidental to the above;
- Personal data which are available in the public domain.

Personal data which may be collected from cookies through the use of the School's website is governed by the Privacy Policy that can be found at www.cis.ky. Nonetheless, your rights remain unaffected.

WHAT PERSONAL DATA DO WE PROCESS?

The School needs to collect and process your child's and your personal data for various academic, educational and administrative purposes. Generally, the personal data that we collect and process include but is not restricted to:

- Name
- Passport number

- Island status
- Immunization record
- Health insurance card
- Address
- Contact numbers
- Personal email address
- Photo
- Nationality
- Student's Gender
- Date of birth
- Previous qualifications
- Parents'/guardian's marital status
- Emergency contact person(s) details
- Billing- related information
- Employment/occupation

If the personal data is necessary to initiate any matter with the School, and you refuse to provide the personal data to the School, then the School will not be able to proceed further with your matter.

SENSITIVE PERSONAL DATA

Some of the personal data that we collect and process may include what is defined as 'sensitive personal data' under the Act and these include, but not restricted to:

- Health records
- Preview school records
- Confidential Student Reference form

This sensitive information shall be treated carefully by the School and will only be used for specific purposes. It will not be released to a third party without your explicit consent unless it is necessary to protect your vital interests or requested by government agencies.

HOW DO WE USE PERSONAL DATA

The purpose for which personal data is collected and further processed includes, but not restricted to the following:

- To process application for admission;
- To manage and respond to enquiries;
- To maintain students' personal details, academic and non-academic records;
- To facilitate co-curricular related activities and other school events;
- To maintain a student/class register;
- To provide the relevant administrative support and counselling services;
- To manage the use of facilities such as library, laboratories, Pool and so on;
- To administer the graduation and alumni related events;
- To administer the tuition fee and other payment;
- To communicate with students/parents/guardians on any important announcements;

- To collect information for relevant local or international statutory authorities or exam boards;
- To contact student's next of kin in case of emergency;
- To comply with any regulatory, audit or security related requirements
- To pursue/collect any sums in arrears by our parents/guardians;
- To care for the medical needs of students;
- For all and any other ancillary purposes relating to our provision of service e.g., the supply of computers, iPads, other forms of telecommunications and technology services;
- Any other purposes related to the smooth running of the School.

PROVISION OF INFORMATION

The provision of all information requested for in the relevant forms of the School is mandatory, unless specified otherwise, in enabling us to process your application/request and offer our services to you. Should you fail to provide the said information, the School may be unable to process your request and/or provide you with the relevant services.

DISCLOSURE OF YOUR PERSONAL DATA

The School will keep your personal data confidential unless you have given the written consent to such disclosure or it is within the ambit of permitted disclosures under prevailing laws/guidelines. The School may disclose your information to the categories of third parties as listed below (not restricted to):

- The Ministry of Education, other relevant government departments/agencies and statutory authorities;
- The student's sponsors including his/her parents/guardians;
- Professional or accreditation bodies;
- Examination boards;
- Third parties appointed by the School to provide services to the School such as gradebook software, lawyers, contractors, printing companies, travel agencies and insurance companies;
- Other institutions or companies within ISS.

RIGHT TO ACCESS AND CORRECT PERSONAL DATA

You have the right to access and correct your personal information held by the School under the Act. We will attempt to keep your records complete, accurate and up-to-date. If you have any reason to believe that your records with us are inaccurate, incomplete or not updated, please notify the School in a timely manner. If you wish to request for access to, or to correct data held by the School, or withdraw your consent to the data processing/use of your personal data by us, please forward your request to cis@cis.ky

Although, we only process your personal data for purposes as stated above, in the event that your personal data is being processed for other purposes (with your consent), you have the right to request us to stop such processing. You may exercise this right by emailing CIS. However, if you choose not to provide and/or fail to supply us with such personal data (and/or decide not to give us consent to

process your personal data, including explicit consent for sensitive personal data), we will not be able to perform the contract of enrolment or process your application for enrolment with us.

Accordingly, if you decide not to provide the mandatory information to us, it may necessarily mean that the Student Contract may have to be terminated or that an offer of a place of enrolment will not be made.

AMENDMENTS TO THIS POLICY

This Policy may be reviewed and amended from time to time. We will communicate such changes along with the updated Policy on the School website: <https://www.cis.ky> 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.