




# Admissions Process Privacy Notice


## Document History

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## 1 Purpose

At the Jakarta Intercultural School (JIS) we value the rights and freedoms of all people. This includes respecting your privacy and protecting your personal data. This Admissions Process Privacy Notice (Notice) describes how we collect and use (or "process") your information during the admissions process. It also tells you how to contact us as well as outlining what rights you have with regard to your personal data that we collect during the admissions process.

In accordance with our School Wide Data Protection Policy, we commit to updating this Notice from time to time to ensure that you are informed about how we process your personal data. You can find the latest version of this Privacy Notice on JISNet.

Our Data Protection Officer (DPO) is responsible for overseeing this Notice. You can contact our DPO at any time with questions, concerns or complaints regarding this Notice by emailing [privacy@jisedu.or.id](mailto:privacy@jisedu.or.id).

This Notice is applicable to all JIS students, parents, and guardians that enroll at JIS.


## 2 References

The JIS Data Protection Policy and this Notice follow the standards and requirements set out in the Indonesian Personal Data Protection Act (PDPA) .

## 3 Definitions and Abbreviations

**Data Subject** are all individuals about whom we hold personal data. In the context of this policy, this includes employees, their spouses, potential employees, JIS students and parents, JIS affiliated consultants, former staff, former students and parents/guardians, contractors, visitors, website visitors, and contacts.

**Personal Data** means any information relating to an individual who can be identified from that information or from any other information we may hold. Personal Data can include names, identification numbers, addresses (including IP addresses), dates of birth, financial or salary details, education background, job titles and images. It can also include an opinion about an individual, their actions or their behaviour. Personal Data may be held on paper, in a computer or any other media whether it is owned by the organisation or on a personal device.

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**Processing means** any activity which is performed on Personal Data or Special Category Data. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction of data.

**Special Categories** of Personal Data are more sensitive, and include information revealing an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership. It will also include data concerning health (physical and/or mental health), data concerning a person's sex life or sexual orientation, and genetic and biometric information where that data is used to uniquely identify a person. We will also treat data relating to criminal convictions or related proceedings in the same way as special categories of data.


## 4 How we obtain your information?

During our admissions process, we collect the personal data in large part directly from parents/guardians, however, we collect some personal data from the children's previous school(s) (if applicable).

## 5 What personal data do we process about you?

The personal data we use during the admissions process takes different forms, including:

- Children's personal identifiers and contact information (such as name and address);
- Parental personal identifiers and contact information (such as name, address, phone number and email address);
- Children's date of birth;
- Children's Nationality/identity Card/passport number;
- Parents'/guardians' employer information;
- Safeguarding/child protection information;
- Photographs;
- Parents' financial information;
- Parents' nationality and passport information;
- Emergency contact information;
- Children's native language/level of English knowledge/other languages spoken;
- Information related to the year and the grade for which each child is applying;
- Attendance (such as sessions attended, number of absences, absence reasons and any previous school(s) attended);
- Assessment and attainment information;

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- Behavioural information (such as exclusions and any relevant alternative provision put in place); and
- Information from previous teacher(s) references (if applicable) related to the children's social development, language and mathematical skills or other skills related to previous educational courses.


As a school, from time to time we also need to process personal data which is designated as “sensitive” or “special category” personal data in order to facilitate our school operations and activities. Such data includes personal data regarding a data subject's concerning:

- Information related to safeguarding/protection, as well as children's health. For example learning needs, disabilities or specific diseases/allergies/food intolerances that require our assistance in terms of organisational facilities and/or our educational support. We will also collect data related to immunizations (vaccinations) when we are required by law to ask for this information.

## 6 Why we collect and process your personal data

The personal data, including that of your children shall be processed by our school for the following purposes:

- Granting access to our online admissions portal, PowerSchool;
- Making an evaluation of students' applications, performing all the related administrative and fiscal activities required when receiving an admission;
- Carrying out all the necessary organisational activities, including evaluating and placing students in different classes, and checking our capability to provide the necessary support to children and parents;
- Verifying that parents have the financial capacity to support the school's tuition and fees;
- Facilitating parental participation by means of a Parent Teacher Association;
- Verifying of the applicant's examination results, academic records and other information;
- Preparing of the enrolment agreement;
- Facilitating visits and tours to view the school;
- Enabling school administration and operation after admissions;
- Facilitating our aptitude testing and assessment process for applicants;

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- Ensuring compliance with school policies and legal requirements, such as to guarantee students equity in opportunities; and
- Engaging in statistical and research

## 7 What are our legal basis for processing your personal data?


The legal basis for processing data in relation to these purposes are:

- To fulfil a contract we have with applicants' parents, or because they have asked us to take specific steps before entering into a contract;
- Compliance with legal obligations;
- Consent; and
- Processing to fulfil our legitimate interest.

In addition, concerning any special category data, our condition for processing such data is:

- The data subject has given explicit consent to the processing of those personal data for one or more specified purposes:
  - To ensure accurate medical information is held by the school Nurse's office in case of existing medical conditions, or in case of emergency.
  - To prevent exposure to any food allergens that children may have intolerances.
  - To ensure emotional support and care through the school councillors.
  - To control access to and monitor the school campus and facilities, as part of security and safeguarding measures.
  - To provide accessibility to all school facilities to children in case of chronic or acute medical conditions or injuries.
  - To ensure children have access to appropriate religious facilities.
  - To allow individual learning support and care plans for all children.
  - In case of school field trips, including overnight trips, where children may participate in sports or adventurous training.

Where we process the personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please contact our Data Protection Officer at [privacy@jisedu.or.id](mailto:privacy@jisedu.or.id).

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## 8 How do we use and protect your personal data?

We limit the access to personal data, retained in physical archives or IT systems and infrastructure, only to those individuals that strictly need to know personal information in order to provide students and parents with specific services, assistance and support. Personal data will be kept confidential and will be protected via appropriate technical and organisational measures to ensure the security of personal data, including policies around use of technology and devices, and access to school systems.

## 9 Categories of recipients to whom the data may be communicated

In the course of school operations, we may transfer personal data (including special category personal data where appropriate) gathered during the admissions process with third parties. Specifically, we may share such data with:


- Examination boards;
- Colleges/Universities;
- Other pre-baccalaureate educational institutions;
- The school's Nurse/Doctor;
- The school's professional advisors; and
- Relevant authorities (if legally required to do so).

We may also be required to share your personal data with other organisations for legal or statutory purposes, or where we have your consent to do so. Moreover, we share personal data on an as-needed basis with our third-party service providers (e.g. to our email service provider in the course of emailing you information).

These service providers process personal data on our behalf and under our instructions for the purposes described above.

Furthermore, we also share personal data with other third parties which process the data as joint data controllers or who are controllers in their own right. These joint data controllers include payment providers and financial institutions as well as law enforcement. We transfer personal data when this is necessary to do so. Sharing data with these parties is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not transfer personal data you have provided unless we are satisfied that the personal data will be afforded an equivalent level of protection.



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We may transfer data to other countries but in doing so will rely on the existence of adequacy agreements or upon standard contractual clauses as part of agreements with data processors.

We will not sell, distribute or lease your personal data to third parties unless we have your permission or are required by law to do so.

For more information on how we transfer data to other countries is available upon request by contacting our Data Protection Officer at [privacy@jisedu.or.id](mailto:privacy@jisedu.or.id).

Additionally, the School will provide information to each pupil/parent (which can include relevant personal data of the respective children) as necessary to facilitate school operations.


## 10 Profiling/automated decision making

We will not use your personal data for decisions based solely on automated processing or profiling if the decision produces legal effects concerning you or significantly affects you, unless you gave your explicit consent for this processing.

## 11 What rights do you have over your personal data?

Under data the PDPA, you have the right to:

- Obtain access to, and copies of, the personal data that we hold about you (subject to legal exceptions);
- Correct the personal data we hold about you if it is incorrect;
- Require us to erase your personal data in certain circumstances;
- Require us to restrict our data processing activities in certain circumstances;
- transfer personal data, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller;
- Object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights (including a right to object to receiving fundraising or communications, and to object to our profiling you for the purposes of fundraising or keeping in touch);
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

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Please note that these rights are not absolute, and we may be entitled or required to refuse requests where exceptions or exemptions apply. We will respond to any such written requests as soon as is reasonably practicable and in any event within 30 days.

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify us of any significant changes to important information, such as contact details, held about you, and ensure that PowerSchool is always up to date.

If you have any questions or concerns about how we are using your personal data, or if you would like to exercise any of your information rights for which we are the data controller, or if you'd like to lodge a complaint about our data practises, please contact us at [privacy@jisedu.or.id](mailto:privacy@jisedu.or.id).

## 12 Right to object


As mentioned above, you have a right to object to processing in certain circumstances. In particular, you may choose to object to the collection or use of personal data:

- Whenever personal data is processed for the legitimate interest of our school
- Whenever data is processed for a task carried out in the public interest or in the exercise of official authority vested in our school.
- Whenever personal data is processed on the basis of consent and you do not consent.

## 13 How do we retain and protect your personal data?

All personal data is securely stored in accordance with legal requirements and school policy. We retain personal data only for the legitimate purpose(s) for which the personal data was collected, relying on the legal basis as mentioned above, and only storing such data for as long as necessary to accomplish those purposes, or as required by law. After we no longer need to process a particular piece of personal data, it is securely destroyed in accordance with legal requirements.

Upon admissions, data will be processed and retained according to the school's Record Management and Retention Scheme. For denied applications, we may retain data for up to five years from the date of denial; for withdrawn applications we can retain data for one year from the date of withdrawal.

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## 14 Contact us

If you have questions, requests or issues, please let us know how we can help. Our Data Protection Officer can be reached at [privacy@jisedu.or.id](mailto:privacy@jisedu.or.id).

### Controller Details

Jakarta Intercultural School  
 Jl. Terogong Raya, No. 33, Cilandak, Jakarta 12430

Pondok Indah Elementary School  
 Jl. Duta Indah III, Pondok Indah, Jakarta, 12310

Pattimura Elementary School  
 Jl. Pattimura, Blok 1, No. 2, Kebayoran Baru, Jakarta, 12110