



Zurich
International
School

Privacy Notice

1 September 2023

1. Introduction

Zurich International School (ZIS) values the privacy of its international community of students, parents, employees, alumni, past parents, past employees, friends and donors as well as the privacy of its suppliers, service providers and other persons with whom ZIS has business contacts. ZIS will, either by itself or through third parties, process personal data relating to the community members, the suppliers, service providers and other business contacts, or their representatives. With regard to such processing, ZIS will qualify as data controller.

Personal data is any information that relates to an identified or identifiable living natural person.

ZIS is committed to ensuring compliance with applicable data protection regulations, in particular the Swiss Federal Act on Data Protection, and, to the extent applicable, the European General Data Protection Regulation 2016/679, each as amended or replaced from time to time.

This Privacy Notice (the **Notice**) explains what personal data we collect, how we collect and for what purposes we use personal data, whom we share it with, how we protect your privacy while doing so, and what your rights are. This Notice applies to all personal data in whatever form collected by or on behalf of ZIS.

2. What personal data is being collected?

Personal data collected and processed by ZIS may include, in particular:

- Names and contact information, such as addresses, job title, business affiliation, phone numbers and email addresses, social security number, language preferences;
- Biographical information, such as gender, nationality, place of origin, place/date of birth and marital status;
- Bank/post account details, credit card numbers;
- Content of our communication with you;
- Engagement with the school, including, for instance, events attended, donations received, volunteer service;
- Enrollment and education information, including, for instance, enrollment dates, assessments, honors and awards received, extra-curricular activities and interests, relevant medical information, special educational needs information, exclusions / behavioral information, psychological reports and assessments;
- Employee-related or job application-related information, including, for instance, professional background and experience,

education and further education, special skills, current interests and activities, relevant medical information, assessments regarding job suitability; information relevant for the performance of the employment relationship, such as work performance and behavior at work, disciplinary measures, working time information, work communication, information relating to the use of IT systems and applications, information relevant for taking out insurance/collecting insurance benefits, salary information, bank details, work permit information, professional part-time activities;

- Photographs and videos (see below section 7);
- Relevant correspondence with you, including, for instance, concerns, particular interests, and how to best communicate with you;
- Cookies and other website usage data.

3. How is personal data collected?

ZIS may collect your personal data either by itself or through third parties from a variety of sources, such as:

- Data submitted during the admission process, for instance via completing the application and health and consent forms, via meetings with employees, via reference obtained from previous schools, etc.;
- Data submitted by job applicants during the recruiting process, including, for instance reference obtained from previous employers;
- Data submitted by employees in the course of their employment;
- Data submitted by suppliers, service providers and other business contacts in the context of the contractual relationship;
- Data obtained in the course of administrative or court proceedings;
- Contact update notifications submitted by email or through forms on the school's website;
- Event registrations;
- Donations made to the school;
- Information provided through the school's social media sites;
- Relevant interactions with the school's governance and administration;
- Publicly available sources of information online, such as company websites, social media channels and news media (to the extent legally permitted);
- Data obtained by actions of ZIS or its data processors, for instance through

evaluations, access control measures, use of IT systems and applications, camera surveillance (see below section 7), etc.

- Data collected through the use of the ZIS website or other ZIS online services (for more information, please refer to the [ZIS Website Privacy Notice](#)).

When submitting personal data, please make sure that the data is correct. When providing personal data about a person other than yourself, please make sure that you are permitted to provide the data and that this other person is aware of this Notice.

We do not use automated data decisions (these are decisions affecting data subjects that are completely automated, i.e. without human influence). Should this exceptionally be the case, we would inform you separately.

4. For what purposes is personal data used?

Personal data is generally used for the purposes of managing our relationship with you, communicating with you and/or to provide you with information you may request from us. More specifically, personal data may be used for the following purposes and for other purposes compatible with the purposes described below:

- Student-related information: Manage school admission and enrollment; provide educational services, including assessment of student performance; provide a safe and secure learning environment; comply with child protection requirements; support and enable academic, pastoral and personal objectives, including monitoring and reporting of progress; provide support and care for emotional and psychological wellbeing; plan and forecast for education service provision; evaluate and take disciplinary measures; enable students to continue or progress their education at other educational organizations;
- Employee-related and job application-related information: data is collected and processed to the extent necessary to assess the employee's/job applicant's suitability for the job and/or for the performance of the employment relationship, including: plan and organize work; assess, support and develop employees in the performance of their duties; make payments to employees (salary, further contractual benefits, reimbursement of expenses etc.); evaluate work presence/absence; evaluate the use of IT systems and applications; evaluate employee satisfaction; evaluate and take

disciplinary measures; meet post-employment obligations; provide employee insurance; financial planning of personnel costs;

- Protect the health of students and employees;
- Help investigate any concerns or complaints you may have;
- Establish, defend or exercise claims;
- Terminate our contractual relationship;
- Meet our statutory reporting requirements to education authorities and other authorities;
- Build and maintain the ZIS international community, including fundraising and mail and email appeals;
- Make you aware and inform you about our services, news, events and activities, including event invitations and invitations to alumni activities and programs;
- Alumni, past parents, past employees: Respond to your requests regarding historic information pertaining to your time at ZIS;
- Provide the opportunity for communication with alumni and alumni networking.

Personal data may further be used for any other purpose you give your explicit consent to, or for purposes that may be of a legitimate interest to ZIS.

5. With whom do we share personal data?

ZIS restricts the use of and access to personal data to those who have an absolute need to know in order to provide the services and serve the purposes described above (authorized personnel or agents). This will normally happen within ZIS, but it may be necessary to share your personal data with certain external recipients (e.g. insurance companies or trip providers). Also, ZIS may be legally required to disclose your personal data to court or governmental authorities (e.g. local education authorities, social security authorities, police, health and social care).

ZIS may also decide to outsource data processing to external service providers (e.g. payroll providers, recruitment services provider, providers of IT hosting and maintenance services, providers of information systems that are necessary for ZIS to deliver the admissions, administration, teaching and learning, pastoral development, and child protection services). In the event of an outsourcing, ZIS will oblige the external service provider to comply with this Notice and to process personal data securely and exclusively for the purposes allowed to ZIS.

Transfers of personal data may occur to countries of the European Economic Area (EEA), to the United Kingdom and/or the United States. If external recipients or external service providers are located in countries whose legislation does not guarantee an

adequate level of data protection, ZIS will implement suitable safeguards in the form of appropriate contractual clauses, namely standard contractual clauses and model contracts for data transfers recognized by the Swiss Federal Data Protection and Information Commissioner, in order to ensure compliance with this Notice and applicable laws.

ZIS does not sell, rent or market your personal data, and does not transfer personal data to third parties other than set out in this Notice, or except with your explicit prior consent or as required under applicable law or regulation.

6. Where do we store personal data?

Personal data is stored on secure server infrastructure located in Switzerland; through the use of third-party applications (such as learning applications), it may also be stored in countries of the European Economic Area (EEA), the United Kingdom and/or the United States. The access of personal data is password protected and restricted to authorized personnel only. In the event of an outsourcing of data processing as described in section 5 above, personal data may be stored on servers of service providers in or outside of Switzerland. To the extent personal data is stored in countries whose legislation does not guarantee an adequate level of data protection, ZIS implements suitable safeguards in the form of appropriate contractual clauses, namely standard contractual clauses and model contracts for data transfers recognized by the Swiss Federal Data Protection and Information Commissioner, in order to ensure compliance with this Notice and applicable laws.

7. Specific rules regarding camera surveillance, photographs and videos

Specific parts of the school campus may be under camera surveillance. This is done for security and safety reasons only. ZIS retains video images for 3 days after which they are deleted, unless retention of the images is required for further investigation or law enforcement processes. Access to these images may be requested through the ZIS Data Protection Lead, see below section 11.

In the course of the school year, photographs and videos of students, parents and employees may be taken to record and share daily campus life. Students, parents, and employees may be identifiable in these photographs or videos. Such photographs and videos may be used for educational and informational purposes (e.g. keeping records of lessons, field trips, sports, events, employee training), for the identification of students, parents or employees for health related purposes (e.g. allergies), or for marketing and publication purposes,

if and to the extent you gave us your consent where required under applicable data protection laws.

8. Data security

ZIS maintains appropriate technical and organizational measures to preserve the confidentiality and integrity of your personal data (protection against unauthorized or unlawful access or processing, accidental loss, destruction or damage).

For security reasons, credit card numbers (e.g. for online donations) are not stored in full and credit card transactions are securely processed through our website by PCI compliant providers, including IATS and First Data, under terms agreed upon by ZIS.

ZIS regularly reviews its security policies and procedures to ensure all systems are secure and protected. In the event of severe data leakage or data breaches caused by accidental events or through malicious actions (e.g. hacking or other cyber-attacks), ZIS will follow its data breach procedures and take appropriate measures to restore the lawful state.

9. Data retention

Unless otherwise set forth in this Notice or otherwise agreed with you, personal data is generally processed for as long as it is required to serve the purposes described above. It may be processed beyond the end of our relationship to establish, defend or exercise claims (during the applicable limitation period), meet legal or post-contractual obligations, including legal documentation requirements, and to safeguard other legitimate interests of ZIS.

10. Your rights

ZIS welcomes your inquiries and comments. You have the right to be informed by us on any processing of your personal data to verify the lawfulness of processing. You may also request a copy of the personal data ZIS holds on you; this includes the right to data portability, i.e. the right to receive your personal data in a structured, commonly used format (so that you can transmit it, e.g. to another international school).

If you are affected by incorrect or incomplete personal data, you may request rectification or completion of any relevant data.

To the extent allowed by applicable law, you may request the deletion of your personal data or a temporary restriction of processing in certain instances, or, under specific circumstances, you may object to the processing of your personal data, in

which case we may, however, no longer be in a position to provide any related services or perform our relationship with you.

Where data processing is based on your consent, you have the right to withdraw consent at any time. Such withdrawal of consent will not affect the lawfulness of the processing based on consent before the withdrawal.

Please note that your rights pursuant to this section may be limited in order to preserve any preponderant interest of ZIS or any third parties.

11. ZIS Data Protection Lead

If you have any questions or concerns regarding any aspect of our processing of your personal data, or if you wish to exercise any of the rights described in section 10, please feel free to contact the ZIS Data Protection Lead (privacy@zis.ch).

12. Applicable law and jurisdiction

This Notice is governed by the substantive laws of Switzerland. Should any dispute, disagreement or claim arise out of or in relation to this Notice, the parties shall try to resolve it by negotiation. If the dispute cannot be resolved, the parties shall be free to submit it to the competent courts of Wädenswil, Switzerland.

13. Changes

ZIS reserves the right to make changes to this Notice from time to time, for example in the event of new developments or new legislation. ZIS will inform you of such changes before they become effective. In any event, it is recommended that you consult the Notice regularly.

Last update: 1 September 2023