



Admissions Process Privacy Notice

v3.1

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Website: <https://www.ssis.edu.vn>

Document Control

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Admissions Process Privacy Notice

Introduction

At Saigon South International School, 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 regarding your personal data that we collect during the admissions process.

In accordance with our Data Protection Policy name, we commit to updating this notice as needed to ensure that you are informed about how we process your personal data. You can find the latest version of this Privacy Notice on our website <https://www.ssis.edu.vn>

Our Data Protection Office (“DPO”) is responsible for overseeing this Policy. Contact details for the Data Protection Office can be found in our Privacy Policy and Data Protection Policy.

Data protection terms

The term ‘personal data’ refers to any information that identifies a person or can be used to identify a data subject when used in conjunction with other information.

The term ‘data subject’ describes the person to whom the personal data relates.

How do we obtain your information?

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

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
- Behavioral 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
- Information from previous school counselors or principal regarding safeguarding, mental well-being, parental involvement, and prior experiences with the applicant
- Health information (such as allergies, medical conditions, vaccinations, and past medical history)
- MAP test from NWEA for admissions assessments

As a school, we may need to process personal data which is designated as “sensitive” or “special category” personal data to facilitate our school operations and activities. Such data includes personal data regarding a data subject 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 organizational 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.

Why we collect and process student 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 admission portal, FinalSite Enrollment;
- Ensure accurate identification of the student;
- Facilitate communication with the applicant's family;
- Provide a means for the school to contact the parents/guardians in the event of an emergency;
- Ensure student wellbeing by inquiring about medical conditions, allergies
- Making an evaluation of students' applications, performing all the related administrative activities required when receiving an admission;
- Carrying out all the necessary organizational activities, including evaluating and placing students in grade levels and checking our capability to provide the necessary support to children and parents;
- Facilitating parental participation through a Parent Teacher Association (PTA);
- Verifying the applicant's examination results, academic records, and other information;
- Preparing the enrollment 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;
- Compile demographic data for reporting purposes, which may be required by educational authorities or for school planning and development;
- Obtain information on the student's behavioral history and any disciplinary actions from previous schools to assess the fit within the new school environment.

What are our legal bases for processing your personal data?

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

- To fulfill 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 fulfill 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,

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 Office at ssis-dpt@sis.edu.vn

How do we use and protect your personal data?

We limit access to personal data retained in physical archives or IT systems and infrastructure only to those individuals who strictly need to know personal information 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 organizational measures to ensure its security, including policies around the use of technology and devices and access to school systems.

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 to third parties.

Specifically, we may share such data with

- Examination boards;
- Colleges/Universities,
- Other pre-baccalaureate educational institutions
- The school's Nurse,
- 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 organizations 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 that 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 it 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 the personal data you have provided unless we are satisfied that the personal data will be afforded an equivalent level of protection.

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 Office at ssis-dpt@sis.edu.vn.

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.

What rights do you have over your personal data?

Under data protection laws, you have the right to:

- Right to be informed
 - Data subjects shall be made aware of any operation of processing of their personal data, unless otherwise provided by law.
- Right to consent
 - Data subjects may or may not consent to the processing of their personal data, unless otherwise provided by Article 17: Personal data processing without requiring the consent of the data subject of Decree No. 13/2023/ND-CP; relating to emergency, legal requirements, state authority, contractual obligations and state agencies.
- Right of access
 - This gives individuals the right to ask us about the Personal Data we use about them. This can include what we use it for, who we share it with, how long we store it and where we have obtained it from. Individuals can also ask to view a copy of their personal data.
- Right to withdraw consent
 - Data subjects may withdraw their consents, unless otherwise provided by law.
- Right to delete data
 - This gives individuals the right to ask for their Personal Data to be erased, but the obligation for us to erase Personal Data only applies in certain circumstances.
- Right to restrict data processing

- Data subjects may request to limit the processing of their personal data, unless otherwise provided by the law. The restriction of data processing shall be initiated within 72 hours after the request of the data subjects for all the personal data requested for restriction of data processing by the data subject, unless otherwise provided by law.
- Right to provision of data
 - Data subjects may request the Data Protection Office to provide them with their own personal data, unless otherwise provided by law.
- Right to object to data processing
 - Data subjects may object to the processing of their personal data by the Personal Data Controller or Personal Data Controller and Processor to prevent or limit the disclosure of their personal data. They may also object to the use of their personal data for advertising or marketing purposes, unless otherwise provided by law.
 - The Personal Data Controller and Personal Data Controller and Processor shall implement the request of the Data Subject within 72 hours after receiving such, unless otherwise provided by law.
- Right to complain, denounce and/or initiate lawsuits
 - Data subjects may complain, denounce or initiate lawsuits in accordance with the law.
- Right to claim damages
 - Data subjects are entitled to claim damages in accordance with the law upon violation of the regulations on personal data protection, unless otherwise agreed by the parties or prescribed by law.
- Right to self-defense
 - Data subjects are entitled to self-defense in accordance with the Civil Code, other relevant laws, and Decree 13/2023/ND-CP, or may request competent agencies or organizations to implement the measures for protection of civil rights as prescribed in Article 11 of the Civil Code.

Consent of the Data Subject

Data Subjects have a number of rights regarding consent of their Personal Data, some of which are subject to conditions.

- The consent of the data subject shall apply to all activities in the personal data processing, unless otherwise provided by law.
- The consent of the data subject shall only be valid when the data subject volunteers and fully knows the following:
 - a) Type of personal data to be processed;
 - b) Purpose(s) of the personal data processing;
 - c) Organizations and/or individuals entitled to the personal data processing; d) Rights and obligations of data subjects
- The consent of the data subject shall be clearly and specifically expressed by written instrument, by voice, by ticking the consent box, by text message, by selecting technical settings, or by another action that demonstrates the same.

- The consent shall be made for a single purpose. Upon multiple purposes, the Personal Data Controller and Personal Data Controller and Processor shall list the purposes for the data subjects to give consent to one or more of the stated purposes.
- The consent of the data subject shall be expressed in a format that can be printed and/or reproduced in writing, including in electronic or verifiable formats.
- The data subjects' silence or non-response shall not be regarded as their consent.
- The data subjects may give a partial or conditional consent. However, SSIS reserves the right to withhold processing students' and employees' applications if partial consent restricts SSIS from fully administering the application.
- Regarding the processing of sensitive personal data, the data subjects shall be informed that the data to be processed is sensitive personal data.
- The consent of the data subject shall be valid until otherwise decided by the data subjects or as requested in writing by a competent state authority, i.e., Ministry of Public Security
- In the event of a dispute, the Personal Data Controller and/or the Personal Data Controller and Processor shall be responsible for demonstrating the consent of the data subject.
- Utilizing authorization under the Civil Code, an organization and/or individual may act on behalf of a data subject to carry out procedures in relation to processing of the personal data of the data subject with the Personal Data Controller or the Personal Data Controller and Processor in case the data subject has acknowledged and given consent thereto as prescribed above, unless otherwise provided by law.

Withdrawal of Consent

- The withdrawal of consent does not affect the legality of the data processing to which the consent was given prior to the withdrawal.
- The withdrawal of consent shall be expressed in a format that can be printed and/or reproduced in writing, including in electronic or verifiable formats.
- Upon receipt of the data subject's request for withdrawal of consent, the Personal Data Controller and/or the Personal Data Controller and Processor shall notify the data subject of possible consequences and damage upon withdrawal of consent.
- Following the review of the withdrawal of consent, the Data controller, Data processor, Data controller and processor, and the Third Party must cease and request relevant organizations and/or individuals to cease the processing of the data to which the consent has been withdrawn by the data subject.

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 purged in accordance with legal requirements.

Upon admission, data will be processed and retained according to the school's Records Management/Records Retention Policy and Schedule. For denied applications, we may retain

data for a period of up to 10 years from the date of denial; for withdrawn applications, we can retain data for 10 years from the date of withdrawal.

Contact us

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 practices, please contact Data Protection Office at ssis-dpt@ssis.edu.vn. You also have the right to contact the Ministry of Public Security.

Controller Details

Saigon South International School

78 Nguyễn Đức Cảnh, Tân Phong, Quận 7, Thành phố Hồ Chí Minh 70000.

