

The Bermuda High School for Girls' Association

Privacy Notice – School Community

At The Bermuda High School for Girls' Association ("**BHS**", the "**school**", "**us**" and "**we**"), your information is important to us and we look after it carefully in line with privacy and data protection laws, including the Personal Information Protection Act 2016 ("**PIPA**"). We've set out below in more detail what information we collect and how we use that information in respect of who we refer to in this document as our school community. Members of our "**school community**" include our current, past and prospective students, their parents, carers or guardians (referred to in this notice as the "**parents**"); donors and visitors. We have a separate privacy notice for our staff.

This notice is intended to provide clear and easily accessible information about our privacy practices and policies. We are responsible for any personal information that is used by us in Bermuda.

This privacy notice does not form part of your contract (if any) with BHS and does not confer any contractual right on you, or place any contractual obligation on us. We may update or otherwise amend this notice at any time.

Definitions

- "**Personal information**" means any information about an identified or identifiable natural person.
- "**Use**" or "**using**", in relation to personal information, means carrying out any operation on personal information, including, but not limited to: collecting, holding, organising, altering, transferring, disclosing, combining, blocking, erasing or destroying it.
- "**Sensitive personal information**" means any personal information relating to an individual's place of origin, race, colour, national or ethnic origin, sex, sexual orientation, sexual life, marital status, physical or mental disability, physical or mental health, family status, religious beliefs, political opinions, trade union membership, biometric information or genetic information.

How we collect your personal information

Much of the information we hold will have been provided by you, for example at the time of your application to enrol your child at the school and throughout your relationship with us. The information in this notice is an addition to any information provided to you at the point of collection.

We may also collect your personal information from other sources including, for example, from the student directly, the school's teachers and from other parents at the school. We may also receive information from third parties, for example other schools or educational institutions. We also collect information through our systems – e.g. IT and email systems and CCTV footage (as described in more detail later in this notice).

Your personal information that we use

The school may directly and indirectly collect and use all or some of the following types of personal information (including sensitive personal information):

- *Parent information* (e.g. name, contact details (phone, home and email address) occupation and contact details at work, if applicable, next of kin information)
- *Financial information* (e.g. parents' bank details to corroborate payments received by the school, and including information regarding financial standing, bursary and scholarship information)
- *Student information* (e.g. name, date of birth, family members (including siblings, if relevant to their application), references given or received by the school and relevant information provided by previous educational establishments and/or other professionals or organisations working with students)
- *Students' past, present and prospective academic, disciplinary, admissions and attendance records* (including e.g. examination scripts and marks, university applications and references)

- *Where applicable, health and welfare information* (including e.g. nominated emergency contact information, any relevant medical information (including any special needs), doctor/other medical professionals' information, information provided to and produced by the school's counsellors in their provision of counselling and support services to students)
- *Correspondence* (e.g. correspondence (physical and electronic) with and concerning staff, students and parents, past and present)
- *Images/photographs* (e.g. images of students, staff and parents (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV)
- *Donor information* (e.g. name, contact details, bank details to corroborate payments received by the school, donation pledges, conditions and deeds (if applicable), relationship to the school and year of graduation (if applicable))

To the extent permitted by applicable laws, we may also collect and process a limited amount of personal information falling into special categories, called "sensitive personal information". Some of the above information is sensitive information (e.g. information about physical or mental health, marital and family status) but it may also include information relating to such matters as racial or ethnic origin.

How we use your personal information

It is important to us that we use your personal information in a lawful and fair manner.

We use or may use your personal information where it is necessary in the context of performing our contract with you (and/or to prepare to enter into a contract with you); to respond to an emergency that threatens the life, health or security of an individual or the public; to carry out a task in the public interest (to provide our education services to our students) and/or, where it is necessary in order for us to comply with a provision of law that authorises or requires such use.

We may ask for your consent to certain processing which is not otherwise justified under one of the above bases. We shall provide clear, prominent, easily understandable, accessible mechanisms for you to give consent in relation to the use of your personal information, unless it can be implied from your conduct that you consent to the use of your personal information (excluding sensitive personal information) for the intended purposes that we have notified you of. Where you provide to us personal information of a third party, e.g. a student, next of kin and other emergency contacts, you must be authorised to share such personal information with us and we presume that you have obtained the individual's consent where applicable.

Where consent is given, it may be withdrawn at any time, but this will not impact on any other lawful basis for processing relied on by the school. In some cases such withdrawal or refusal may mean that we're unable to continue your engagement with the school if we do not have the personal information we believe necessary for the effective and efficient administration and management of our relationship with you and the applicable student.

By way of example, we use your personal information:

- For the purposes of student selection (and to confirm the identity of students and parents)
- To provide education services to students and to monitor their progress and educational needs
- To provide effective communication to parents
- To maintain relationships with alumni and the school community (including former parents and staff), including direct marketing and fundraising activities
- For the purposes of donor due diligence, to confirm the legitimacy of funds received
- To enable relevant authorities to monitor the school's performance and to interview or assist with incidents as appropriate

- To give and receive information about past, current and prospective students, including relating to outstanding fee history, education institutions of attendance and to provide references to potential future educational institutions and/or employers of alumni
- To monitor (as appropriate) the school's IT and communications systems, and for security purposes
- To carry out or cooperate with any school or external complaints, disciplinary or investigation processes
- Where otherwise reasonably necessary for BHS' purposes, including to obtain appropriate professional advice and insurance for the school

We will keep your personal information no longer than is necessary for the purpose of its use, including in accordance with any statutory or regulatory requirements and our record retention policies. A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes.

Who has access to your personal information

Personal information will only be used and disclosed as permitted by applicable law.

For the most part, personal information collected by the school will remain within BHS, and will be accessed and used by appropriate individuals only in accordance with our access protocols (e.g. on a 'need to know' basis).

We may also share certain personal information with third parties. For example:

1. To applicable examination boards and other regulatory bodies
2. To education institutions, including colleges and universities, to which the student may apply, and including UCAS
3. To potential or current employers of our alumni
4. To healthcare providers where applicable, such as Solstice, the hospital and/or other medical professionals
5. To our professional advisors such as our legal counsel (e.g. Conyers), banks (e.g. The Bank of Butterfield, HSBC, Clarien), auditors (e.g. KPMG), corporate service provider, shareholders, consultants and other professional advisors
6. Other service providers, such as our consultants (e.g. CCS), security and IT providers
7. Other system providers used by the school – for example to process payments and donations to the school (e.g. Bloomerang and Authorize.net), to process funds from certain jurisdictions such as the US for tax deductible purposes (e.g. Bermuda Community Foundation), and for other communication and platform purposes (e.g. Veracross, ManageBac, Unifrog, Google Drive and SIMS (school information management system))
8. Government or regulatory authorities if required by applicable law (e.g. the Department of Education, the Department of Child and Family Services and the Department of Immigration). This could relate to, for example, our complying with our statutory obligations in relation to the care of our students, in light of imminent or pending legal proceedings or a statutory audit of the school.

Personal information is also accessed by third parties whom we work together with in connection with IT services, such as hosting, supporting and maintaining the framework of our information systems. Personal information may also be shared with certain interconnecting systems. Data contained in such systems may be accessible by providers of those systems, their associated companies and sub-contractors.

Some of these transfers will include transfers overseas. For example we sometimes share personal information with our consultants and other professional advisors based abroad (e.g. EDU365, based in the Cayman Islands, Google Drive and other software systems used by the School) or with educational institutions abroad.

Where your personal information is transferred to a third party located outside of Bermuda, we will take steps to ensure that your personal information is adequately protected and transferred in accordance with any applicable data transfer requirements.

Monitoring

Any usage of school systems, telephones, email and internet facilities may be subject to monitoring in compliance with law and best practice. For example, we may monitor students' usage: to prevent, detect or investigate suspected wrongdoing or abuse of school policies; to comply with legal obligations; or to locate and retrieve lost messages or files.

Email and internet usage are potentially subject to interception and to disclosure to third parties in the course of litigation or an investigation. We have a legitimate basis on which to access and protect school data stored or processed on a device, including the content of any communications sent or received from the device.

The school uses CCTV, internally and externally, and you may be recorded when at or around the school's premises. We use the CCTV footage for security purposes, and to prevent, detect or investigate suspected misconduct, illegal conduct, wrongdoing or other misuse by the staff and/or student community.

Medical information

The school may need to process certain medical information to comply with its statutory duties and to keep pupils and others safe, but the school will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for school trips or for catering purposes. Express consent will be sought where appropriate. However, a certain amount of any special needs requirements will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

Safeguarding information

Students and parents are reminded that the school is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the police.

Keeping in touch and supporting the school

The school will use the contact details of members of the school community to keep them updated about BHS' activities, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, BHS may also contact staff, parents and/or alumni by post and email in order to promote and raise funds for BHS and, where appropriate, other worthy causes. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, BHS is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Security safeguards that we use

We will take reasonable steps and adopt appropriate safeguards against risk (including physical and IT based security measures and controls) proportional to the potential harm, sensitivity and context of the personal information which comply with applicable laws to protect our school community's personal information against loss, unauthorized access, destruction, use, modification, disclosure or other misuse. Access to personal information is also restricted to authorised employees and agents who require access for a permitted purpose to perform their employment functions, and whom have been advised as to its proper handling.

Your rights in relation to your personal information

Individuals have certain rights with respect to their personal information, and you may submit to us reasonable written requests to:

- Access your personal information that is in our custody or control
- Correct an error or omission in any of your personal information which is under our control
- Cease, or not to begin, using your personal information where the use of that personal information is (i) for the purposes of advertising, marketing or public relations and/or (ii) causing, or is likely to cause, substantial damage or substantial distress to the individual or to another individual
- Erase or destroy your personal information where it is no longer relevant for the purposes of its use

Any request must be in writing and provide sufficient detail to enable us to identify the personal information to which the request relates.

Contacting us & our Privacy Officer

BHS is located at 19 Richmond Road, Pembroke, Bermuda HM 08.

If you have any questions about this privacy notice or to request more details about your rights and how we handle your personal information, please contact: Leslie Chauvet Ichauvet@bhs.bm.

You can also contact our Privacy Officer at Leslie Chauvet at Ichauvet@bhs.bm.

Privacy notice updates

This privacy notice is subject to change in accordance with changes to applicable laws or our internal policies and procedures. The date below indicates when this privacy notice was last revised.

Any changes to this privacy notice will be effective upon publication of the revised privacy notice.

Version Control

Version	Date	Approved by	Comment
1.0	December 20,2024	Carol A Swainson, Head of School	Privacy Notice implemented pursuant to PIPA requirements