The Anglo-American School of Sofia

Privacy Notice

Introduction

The Anglo-American School of Sofia (referred to in this document as "AAS", "the school", "we") is the data controller meaning AAS establishes the purposes and means of processing the personal data. The school is a legal entity under Bulgarian Law having its registered seat and management address at 1407 Sofia, Losenets Region, 16 Kozyak Street, UIC under Bulstat Register 131412106. Our campus location and mailing address is at Siyanie Street 1, Pancharevo Sofia 1137, Bulgaria.

AAS has a specially appointed Data Protection Officer who can be contacted by e-mail: dpo@aas-sofia.org and phone: + 359 2 953 1311, 0700 1 40 50.

AAS processes personal data of natural persons („data subjects") as part of its everyday operations of providing educational services in accordance with the General Data Protection Regulation (EU) 679 / 2016 ("General Data Protection Regulation", "GDPR"), the applicable Bulgarian legislation and the guidelines of the Bulgarian Commission for Personal Data Protection.
According to the General Data Protection Regulation ***personal data*** means any information relating to natural persons through which they can be directly or indirectly identified.

Processing of personal data is any operation or set of operations which is performed on personal data by automated or other means.

This Privacy Notice explains how we collect and use personal data, who we share it with and the ways in which we protect your privacy while doing so. This Notice applies to all personal data collected for and on behalf of AAS. This pertains to both information collected in analogue form (forms, documents, in writing) and through technological means, such as information systems and email. This Privacy Notice applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form.

Natural persons whose personal data are processed by the school

AAS processes personal data on its prospective, current and former students and their parents or guardians, current, potential and former employees, contractors or potential contractors and their employees, service providers, visitors and other natural persons in relation to the normal activity of the school.

The categories of Personal Data that AAS processes, include, but are not limited to the following:

Based on the specific objectives and legal grounds AAS processes all or some of the following personal data, individually or in combination:

- Identification and contact information (full name, citizenship, country of birth, address, information included in ID's / passports, phone number, e-mail etc.);
- Financial information, including bank accounts of parents, employees and contractors;
- Health data: medical history, allergies, immunization records, disorders, medical examination results and other medical data of the students;
- Data related to the educational background and regarding school performance of the students: academic, disciplinary or other educational related records, academic references, special needs, hobbies, results of educational diagnosis testing, test results, feedbacks, evaluations etc.;
- Behavioural data as well as data on preferences / interests of students;

- Employees' family status and family ties (spouses, children or other relatives) information, for the purposes of relocation, visas, etc.
- Information and personal data necessary for performing the duties under the labour, social security and tax legislation including health data for the purposes of occupational medicine, assessment of the employee's ability to work, medical diagnostics, provision of health or social care or treatment;
- Photos and videos for the purposes of admission, employment, various events, yearbooks, etc.
- When outside persons visit AAS buildings, we do not scan and do not make a copy of his/her ID document. We only extract the necessary information - names, ID document identification number, and nationality using machine reading.

The purposes for which AAS processes your personal data

AAS processes personal data for the following purposes:

- Provision of educational services, starting with the admission process, enrolling students, administration of classes and timetable, teaching activities, issuance of academic records, administration of examinations.
- Provision of educational ancillary services: library services, extracurricular activities, school trips, school events, managing school's publications
- Compliance with the staff-related requirements of the labour and social security legislation;
- Ensuring campus security: monitoring access on campus, performance of video surveillance.
- Provision of the medical care and counselling that students may need.
- School administration: handling student records and other academic documentation, administration of fees and accounts, internal audits and controls, reporting and statistics creation, implementing school policies, archiving, assessing the quality of our services, facilitating research activities.
- School related communications: conveying various messages related to the students and AAS's activities by any communication means.
- Collaboration with other schools and educational institutions;
- Performance of agreements with service providers and contractors, including insurance suppliers;
- Other legitimate purposes such as legal services, maintenance and security of the AAS website and IT systems, protection of the AAS legitimate interests including dispute resolution and litigations;
- To fulfil statutory obligations in connection with visa/residence permits requirements under European and national migration legislation; in relation to the execution of proper and lawful accounting; arising from execution of the orders of competent state or judicial authorities.
- To carry out police checks on all employees. The police checks may be from country of origin and / or from the country of their most recent posting.
- To perform security checks of prospective local students' parents which aim is to establish that a family is a good fit to AAS.

The lawful basis for the processing operations we conduct with regard to the personal data

AAS collects and further processes personal data, based on one of the following legal grounds, expressly laid down by the GDPR:

- Performance of a contract, including pre-contractual relations before its signing;
- A legal obligation that requires AAS to process your personal data;
- For the performance of task carried out in the public interest;
- The legitimate interest pursued by AAS, insofar as they have priority over the interests or fundamental rights and freedoms of the data subjects;
- The consent you have granted us, prior to any processing of the personal data, for purposes not covered by above legal grounds.

With respect to the processing of the ***special categories of personal data*** **under the GDPR**, respectively health data, please take into consideration that AAS processes **health data** based on the following legal grounds:

- Carrying out the obligations and exercising the specific rights of AAS or the data subject in the field of employment and social protection law;
- The necessity of the school nurse to process such data for the purpose of medical diagnosis and the provision of health or social care or treatment on the basis of national health legislation and for meeting special needs, e.g. students suffering from allergies, physical disabilities or undergoing medication treatment.

How the school collects data

Generally, the school receives personal data from the individual directly or, in the case of students, from their parents or guardians. This may be via a form, online application or simply in the ordinary course of interaction or communication (such as telephone calls, in person, email or written communication or assessments).
However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual), or collected from publicly available resources.

The personal data of employees, prospective and current students and their parents/guardians, contractors and visitors are provided voluntarily by the persons themselves and are collected by AAS in fulfilment of a statutory obligation, in connection with employment, conclusion and performance of a contract, provision of educational services and others. Failure to provide the required information, including the necessary personal data, will lead to the impossibility of AAS to conclude a contract or to provide the requested service.

Disclosure of personal data

AAS discloses personal data limited to what is necessary and only to those members of AAS, staff and collaborators, who need access to the personal data mainly for ensuring the provision of the educational and ancillary services.
With respect to the disclosure of your personal data to third parties, outside AAS, please note that such disclosure is performed solely in the regular activity of the school. The categories of recipients include the following:

- IT providers, including educational applications, online tools, server hosting suppliers etc.
- Physical security companies, contracted by the AAS;
- Cafeteria contractor in its capacity of independent provider of meal services on campus;
- Other educational institutions or organizations, not limited to other schools;
- Travel agencies, insurance companies and transportation providers;
- AAS's photographer and video crew or companies providing photographic and video services;
- Courier services providers;
- Utilities services providers;
- Public authorities and institutions, national or foreign, judicial courts;
- Foreign embassies or other forms of diplomatic missions for visa or other references;
- Tax, legal, accounting, and other consultants.

Retention and disposal of personal data

AAS, in keeping with good practice of maintaining detailed and complete records may choose to keep your personal data as long as necessary to the extent required by law or best educational practice, for the fulfilment of its legitimate purposes, for archival of records or general reference. In some cases, it may be used for specific legal purposes, such as for the establishment, exercise or defence of legal claims. When retention is no longer necessary for purposes of which it was collected, reasonable steps will be taken to delete the personal data in a secure manner.

Video Surveillance

The School has implemented a video surveillance system on the campus, in order to ensure security of its students, staff and all the other persons that enter our premises. The security and wellbeing of our students is our primary concern and these video cameras allow us to offer real time protection.
Cameras are located in public and communal areas, where there is an elevated risk of incident, and strictly not in areas which would invade privacy of staff, students or visitors. Cameras are not connected to the internet for remote access
The areas covered by a video camera are signalized on campus through specific banners, informing you with regard to the video surveillance conducted by the AAS.

Security of personal data

AAS applies all appropriate technical and organizational measures to ensure the security of personal data, including policies around use of technology and devices, access to school systems, and destruction of data at the end of the relevant retention period as well taking explicit confidentiality obligation by the employees.

Your rights related to the processing of personal data by AAS

AAS respects all the rights mentioned under the GDPR and is committed to furnishing the appropriate means by which you can exercise these rights, according to the details mentioned below. Any natural person whose data are processed by the School has the following rights:

- the right to access his/her personal data, including receiving a copy thereof;
- the right to rectification or completion of inaccurate personal data;
- the right to erasure of personal data processed without a legal basis;
- the right to restriction of processing - in case of a legal dispute between the school and the person until its resolution or the establishment, exercise or protection of legal claims;
- the right to object - at any time and on grounds relating to the particular situation of the person, provided that there are no compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or legal claims;
- the right to data portability - applicable only to the personal data you have provided to us and where the processing is carried out by automated means based on your consent or for the performance of a contract.

In the situation where you may wish to exercise any of the rights listed above you should put your request in writing to our Data Protection officer at the School's office or via email / post. An application may also be made electronically in accordance with the Bulgarian Electronic Document and Electronic Certification Services Act. The application may be submitted personally by the data subject or by data subject's legal representative (parent/guardian or a person expressly authorized by the data subject with a power of attorney). The requestor may be asked to complete a Data Subject Access Request Form to better enable the School to locate the relevant information.
The school shall decide upon the request of the data subject within 30 days of its submission. That period may be extended if additional information/documents should be provided by data subject in connection to the subject matter of the request or for the purpose of verification of data subject's identity. The requestor will be informed by the Data Protection Officer in writing if there if there will be any deviation from the 30-day timeframe due to other intervening events.
If more time is needed to respond to complex requests, an extension of another two months is permissible, provided this is communicated to the data subject in a timely manner within 30 days.
Where the data subject's requests for the exercise of the rights referred to above are manifestly unfounded or excessive, the School may impose a fee or refuse to act on the request.

Protection of the rights of data subjects

In accordance with the Personal Data Protection Act and Regulation (EU) 2016/679, any individual who considers his/her right to protection of personal data violated, may file a complaint with the Commission for Protection of Personal Data at: Sofia 1592, 2 Prof. Tsvetan Lazarov blvd.,web site: www.cpdp.bg.

Updates and changes to the Privacy Notice

In order to apply the relevant protection measures and to comply with current legislation, we will regularly update this Privacy Notice. If the changes made by us are substantial, we may post a notice about such changes in our website or let you know otherwise.

This Privacy Notice was last updated on 20 September 2019