

Data Protection Policy for Student-Related Information and Data

1. Purpose

This Data Protection Policy ("Policy") is established to safeguard the privacy, security, and proper use of student-related information and data ("Student Data") handled by [GEC Academy] (hereby refer as the institute). The institute are committed to protecting the rights and interests of students, ensuring compliance with applicable data protection laws and regulations, and maintaining the trust of students, their guardians, and other stakeholders.

2. Scope

This Policy applies to all Student Data collected, processed, stored, shared, or otherwise handled by the institute in the course of providing educational services, administrative functions, and any other activities related to students. It covers data related to current students, prospective students, and former students.

3. Definition of Student Data

"Student Data" includes but is not limited to:

- Personal Identifiable Information, such as name, date of birth, student ID number, gender, nationality, passport or other identification numbers, contact information (address, phone number, email), and emergency contact details.
- Academic information, including enrollment records, course registration details, academic transcripts, examination results, educational achievements, and disciplinary records.
- Financial information, such as tuition payment records, financial aid applications and awards, scholarships, and fee payment histories.
- Health and wellness data, including medical records, health insurance information, disability-related accommodations, and any information related to physical or mental health that is necessary for the Institution to provide appropriate support and services.
- Guardian or parent information, including names, contact details, and any relevant information provided in relation to the student's care and education.
- Participation in extracurricular activities, including details of sports, clubs, organizations, and any events or programs the student is involved in.
- Data collected through technological means, such as online learning platform usage data, computer network access logs, and data from educational software or applications used by the student.
- Any other information that can be used to identify a student or is relevant to the student's relationship with the Institution.

1. Collection of Student Data

4.1 Lawful Basis

We collect Student Data only for legitimate and specific purposes that are necessary for the provision of educational services, administrative management, compliance with legal obligations, or the legitimate interests of the Institution, provided that such

interests do not override the rights and freedoms of the student. The specific lawful bases for data collection may include:

- Performance of a contract with the student (e.g., enrollment in courses, provision of educational services).
- Compliance with legal obligations (e.g., reporting requirements to educational authorities, tax laws).
- Legitimate interests (e.g., improving educational programs, ensuring campus safety, facilitating communication with students and guardians).
- Consent, where required by applicable law, such as in cases where we collect sensitive data or use data for a new purpose outside the original collection purpose.

4.2 How Data is Collected

Student Data is collected through various means, including but not limited to:

- Registration and enrollment forms filled out by the student or their guardian.
- Academic and administrative processes, such as course registration, examination submissions, and financial transactions.
- Communication with the student, guardian, or other relevant parties, including emails, phone calls, and in-person meetings.
- Use of technological systems and platforms, such as learning management systems, student information systems, and online assessment tools.
- Surveys, questionnaires, and feedback forms.
- Third-party sources, with proper authorization and in compliance with data protection laws, such as educational institutions where the student has previously studied, government agencies, or professional organizations.

4.3 Transparency

We will inform students and, where appropriate, their guardians about the collection of Student Data at or before the time of collection. The information provided will include:

- The purpose(s) for which the data is being collected.
- The types of data being collected.
- The recipients or categories of recipients of the data.
- Whether the provision of data is mandatory or voluntary, and the consequences of not providing the data.
- The rights of the student and guardian in relation to the data, as outlined in this Policy.
- How to contact us for any questions or concerns regarding the data collection.

5. Use of Student Data

5.1 Purposes of Use

Student Data will be used only for the purposes for which it was collected and as permitted by law. The primary purposes of using Student Data include:

- Providing educational services, such as course delivery, academic advising, assessment, and issuance of academic credentials.
- Administrative management, including student enrollment, scheduling, fee management, and campus facilities management.
- Communication with students and guardians, including sending important notifications, academic updates, and institutional announcements.
- Ensuring compliance with legal and regulatory requirements, such as reporting to educational authorities, maintaining accurate records for auditing purposes, and adhering to anti-discrimination laws.
- Improving educational programs and services, through data analysis, research, and feedback evaluation, provided that such activities are conducted in a manner that protects the privacy of students.
- Facilitating student support services, such as counseling, health services, and disability accommodations.
- Maintaining campus safety and security, including monitoring access to facilities and investigating incidents.

5.2 Limitation of Use

We will not use Student Data for any purpose that is incompatible with the purposes for which it was collected, unless we have obtained the necessary consent or have a legal basis to do so. We will also not use Student Data in a way that is discriminatory or violates the rights and freedoms of students.

6. Sharing of Student Data

6.1 Recipients of Data

Student Data may be shared with the following recipients, provided that such sharing is in accordance with applicable data protection laws and this Policy:

- Internal departments and staff of the Institution who have a legitimate need to access the data for the performance of their duties, such as academic advisors, administrative staff, and IT personnel.
- External service providers who assist us in providing educational services or administrative functions, such as IT service providers, textbook publishers, and examination agencies, provided that we have entered into appropriate data processing agreements with them to ensure the protection of the data.
- Educational authorities, government agencies, and regulatory bodies when required by law, such as for reporting enrollment statistics, complying with audit requirements, or responding to legal requests.
- Other educational institutions, in connection with student transfers, academic collaborations, or research projects, with the student's consent or as otherwise permitted by law.

- Guardians or parents of minor students, to the extent necessary to fulfill our communication and administrative obligations in relation to the student.

6.2 Conditions for Sharing

Before sharing Student Data with any third party, we will ensure that:

- The sharing is for a legitimate purpose and is consistent with the purposes for which the data was collected.
- The recipient is capable of maintaining the security and confidentiality of the data, and we have appropriate safeguards in place, such as data processing agreements that impose obligations on the recipient to protect the data.
- Where required by law, we have obtained the consent of the student or, in the case of minor students, their guardian, unless the sharing is otherwise permitted without consent (e.g., due to a legal obligation).
- We have taken appropriate steps to anonymize or pseudonymize the data, where possible, to protect the privacy of the student, especially when the data is shared for research or statistical purposes.

6. Security of Student Data

6.1 Technical and Organizational Measures

- We take appropriate technical and organizational measures to protect Student Data from unauthorized access, disclosure, alteration, and destruction. These measures include but are not limited to:
 - Access controls, such as user authentication and authorization systems, to ensure that only authorized personnel can access Student Data.
 - Data encryption, both during transmission and storage, for sensitive information.
 - Regular security audits and vulnerability assessments of our information systems.
 - Employee training programs to ensure that staff are aware of data protection principles and their responsibilities for protecting Student Data.
 - Secure data storage facilities, including physical security measures for server rooms and data centers.
 - Backup and disaster recovery plans to ensure the availability and integrity of Student Data in the event of a security incident or system failure.

6.2 Incident Response

In the event of a suspected or actual security incident involving Student Data, we will take prompt action to contain the incident, assess the impact, and notify the appropriate parties as required by law. This may include notifying affected students, guardians, and data protection authorities within the timeframes specified by applicable regulations.

7. Retention of Student Data

7.1 Retention Periods

- Student Data will be retained only for as long as necessary to fulfill the purposes for which it was collected and in accordance with legal and regulatory requirements. The retention periods will vary depending on the type of data and the relevant purposes. For example:
 - Academic records may be retained for a period of 5 years after the student has graduated or left the Institution, in accordance with educational accreditation requirements and legal obligations.
 - Financial records may be retained for 5 years to comply with tax and accounting laws.
 - Personal data of former students may be retained in a limited form for alumni relations purposes, provided that such retention is in line with the students' rights and our legitimate interests.

7.2 Data Disposal

When Student Data is no longer needed, we will dispose of it in a secure manner, ensuring that it cannot be recovered or accessed by unauthorized parties. This may involve deleting data from our systems, destroying physical records, or using other appropriate methods of data sanitization.

8. Rights of Students and Guardians

8.1 Right to Access

Students and, where applicable, their guardians have the right to request access to the Student Data that we hold about them. Upon receiving a request, we will provide a copy of the data in a structured, commonly used, and machine-readable format, unless otherwise prohibited by law.

8.2 Right to Rectification

If a student or guardian believes that any Student Data held by us is inaccurate or incomplete, they have the right to request that we correct or complete the data. We will take reasonable steps to verify the accuracy of the data and make the necessary corrections as soon as possible.

8.3 Right to Erasure (Right to be Forgotten)

In certain circumstances, students and guardians may have the right to request the erasure of Student Data. This right is not absolute and is subject to legal exceptions, such as where the data is required for compliance with a legal obligation, the exercise or defense of legal claims, or for public interest reasons. We will assess each request for erasure on a case-by-case basis and respond in accordance with applicable law.

8.4 Right to Restrict Processing

Students and guardians may request to restrict the processing of their Student Data in cases where they believe the data is inaccurate, the processing is unlawful, or they object to the processing for reasons related to their particular situation. During the period of restriction, we will only store the data and not process it further, except for archiving purposes or with the consent of the data subject.

8.5 Right to Data Portability

Where applicable, students have the right to receive the Student Data they have provided to us in a structured, commonly used, and machine-readable format and to request that we transfer this data to another controller, provided that the processing is based on consent or a contract and is carried out by automated means.

8.6 Right to Object

Students and guardians have the right to object to the processing of their Student Data on grounds related to their particular situation, where the processing is based on our legitimate interests or public authority. We will stop processing the data unless we can demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject, or the processing is for the establishment, exercise, or defense of legal claims.

8.7 How to Exercise Rights

To exercise any of the above rights, students or guardians should contact us using the contact information provided in Section 11 of this Policy. We will respond to requests without undue delay and within the timeframes specified by applicable law. We may request additional information to verify the identity of the requester and the nature of the request to ensure the protection of Student Data.

9. Contact Information

For any questions, concerns, or requests regarding this Policy or the handling of Student Data, please contact us at:

GEC Academy

[Floor 16, Huarun Shidai Centre, Chaoyang District, Beijing, China

+86 (0)10-56032088 info@globaleducon.cn

10. Policy Updates

We may update this Policy from time to time to reflect changes in data protection laws, our practices, or the needs of the Institution. Any material changes will be posted on our website and, where appropriate, communicated to students and guardians through official channels. We encourage you to review this Policy periodically to stay informed about how we protect Student Data.

11. Effective Date

This Policy is effective as of commencement date of the COBIS Research Skills competition and supersedes all previous versions of our data protection policy related to Student Data.

By using the services of the Institution and providing Student Data, students and guardians are deemed to have accepted and agreed to the terms of this Policy.

