



The Ostrava
**International
School**

*One World.
Our School.*

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DATA PROTECTION POLICY

- REVISED SEPTEMBER 1ST, 2020



Terminology

The following data are defined for the purposes of this Policy and in accordance with Regulation (EU) 2016/679 On the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation)

School - The Ostrava International School, s.r.o. IČ 028 15 303, registered at Gregorova 2582/3, Ostrava

Controller - School (Head of School and Authorised employees)

Personal data - an indication by which an individual can be identified (eg name, surname, date of birth, photograph, etc.)

Data subject - particularly the student, their legal guardian, employee

Third parties - other persons contracted with the school

Personal Data Protection Officer - Ing. Jiri Knopp, tel .: +420 776 089 339, email: gdpr@jkgrant.cz

Authorized person - Mgr. Nikola Gray Jirousek, attorney at Preslova 9, Ostrava, tel .: + 420 724 14 22 87

Legislation - CR Law, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Regulation protection of personal data)

The lawfulness of processing - Art. 6 GDPR

OpenApply - an electronic school database that holds personal information about the student and the student's legal guardian, provided in the admissions process.

ManageBac - on-line database primarily containing information about student academic achievement, including homework and tasks, etc...

Edupage - Edupage is used as a class register (to fill in the basic facts about the lessons, including the number of the lesson, the content of the lesson, students' absence etc). You can also find teacher and class schedules, daily substitutions and the plan of school events.

1. Scope

This Policy establishes the responsibilities and practices of the School and its staff, or third parties in the processing of personal data. This includes rules for the collection, organisation, use of, storage of, distribution of and archiving of personal data.

2. Principles of processing personal data

When processing personal data, the School, School employees, and third parties, are bound to adhere to the following principles:

- To process personal data in accordance with the law
- To process personal data in accordance with the lawfulness of processing, and on the basis of legal regulations; specifically:
 - for the performance of a contract,
 - for fulfilling the statutory duties of the Controller,
 - for protecting the vital interests of the Data subject (especially children needing heightened protection),
 - for protecting the legitimate interests of the School
 - for the performance of a task carried out in the public interest,
 - for processing data on the basis of consent
- To process personal data for their intended purpose and to the extent needed, and to ensure that the personal data are true and accurate
- To proceed with regard to the obligation to protect personal data from misuse while concluding contracts, and in legal proceedings
- To minimise the processing of personal data wherever possible
- To respect the rights of the Data subject to provide and to withdraw consent for processing, to implement erasure rights, or to object to the scope of processing
- To provide heightened protection for children when processing personal data
- To communicate with the Data subject about the processing of their personal data
- To cooperate with the school's Data Protection Officer

3. Procedures of the School, its employees, and third parties when processing personal data

3.1 The School uses all appropriate and available means to protect from misuse the personal data that it collects and processes. In particular, the School keeps personal data in physical areas and electronic systems that are limited in access to the Head of School and a pre-established group of appointed individuals. All individuals may receive access to personal data only with the express permission of the Head of School.

3.2 The Head of School shall ensure the management and processing of personal data, which will be provided to his Authorized representative and to the Data Protection Officer, and may include the following:

- Oral or written information
- Written communication
- Assigned responsibilities in Employment Contracts, Agreements on Work Performance (DPP), and Agreements on Work Activity (DPČ).
- Contracts which the School enters into with third parties (including leases, contract work, service provider contracts, etc.).

3.3 The School shall minimally on a yearly basis evaluate its procedures for the handling and processing of personal data. Evaluation may be made according to the customs of the School, in the form of a brief record, for example, in the minutes of a meeting. If certain school practices are found obsolete, unnecessary or unsuccessful, the school shall immediately remedy the situation.

3.4 Every School employee shall respect the nature of the personal data being processed, recognising it as being part of the privacy of a person as a Data subject, and adjusting related procedures accordingly.

In particular, the employee:

- will not disclose personal data information without verifying that such a procedure is possible,
- will not disclose personal information to persons who do not have the right to dispose of them.

In the event that an Employee is asked by the Data subject to provide information about the the Data subject's rights concerning Personal data, or is required by law or School directives to do so, the Employee will:

- inform the Data subject about his or her rights in accordance with the protection of personal data,
- otherwise, the Employee will defer to the Head of School, or Authorised person, or to the Data Protection Officer.

3.5 In Collecting and Processing personal data, the School actively cooperates with the Data Protection Officer.

3.6 The School immediately addresses each personal data security incident, in cooperation with the Data Protection Officer. In the event that the incident is likely to result in a high risk to the rights and freedoms of an individual, in particular a specific student, employee,

legal guardian, etc., the School always informs and communicates to the Data subject of the corrective action to be taken. Every incident will be recorded. The School informs the Office for Personal Data Protection of any serious incident.

3.7 Organizational measures to protect personal data in School

3.7.1 Printed materials from School registration documents, which contain the personal data of students are permanently stored in locked cabinets in the offices of the School, and depending on the nature of the data, either in the offices of the Head of School, Deputy Heads of Early Years Centre, Primary and Secondary Schools, or in the Financial Department Office. In justifiable cases, Authorised Employees may have access to School registration documents for limited amounts of time in order to make entries. Such materials, or parts thereof, can not be taken out of School, passed on to strangers, or copied and provided to unauthorized persons.

3.7.2 **The School's electronic School registration database** is maintained in a secure Information System called **OpenApply**. Limited and specifically defined access to this system is provided by the Head of School to the School management and Authorised individuals, in the form of a unique login and password. When working with electronic records, authorized individuals must:

- not leave their computers without logging out,
- not allow an unauthorised person to view their computer screen
- protect the confidentiality of the login password (which, in the event of disclosure must be changed immediately in cooperation with the network administrator).

Procedures are set by the Head of School and implemented by the Authorized employees of the School. The student's legal guardian has secured remote access only to their own data through an individualised login and password.

3.7.3 Each student is provided with a personal School account, which contains records of an academic nature in the on-line, secured **ManageBac and Edupage** information systems. The Head of School authorises Employees and other Authorised individuals limited and specifically defined access to Managebac and Edupage through a unique login and password. When working with electronic records, authorized individuals must:

- not leave their computers without logging out,
- not allow an unauthorised person to view their computer screen
- protect the confidentiality of the login password (which, in the event of disclosure must be changed immediately in cooperation with the network administrator).

Procedures are set by the Head of School and implemented by the Authorized employees of the School. The student and the student's legal guardian have secured remote access only to their own data through an individualised login and password.

3.7.4 **The printed personal files of Employees** are stored in lockable cabinets in the office of the financial manager of the School. Access to the data is provided to the Head of School, the School's financial manager, and the School accountant.

3.7.5 Employees are made aware of their right to familiarise themselves with the contents of their personal files.

3.7.6 Employees of the School do not provide, unless legally mandated, any personal data of the employees of the School, or students of the School and their legal guardians, to unauthorised individuals or institutions in any form.

3.7.7 Written School documentation that is sent out of the School (including documentation for the purposes of court proceedings, admissions procedures, or transfers to other schools) are processed by Authorised individuals designated by the Head of School. Authorised individuals, however, may not sign, award or send such documentation on behalf of the School or themselves, and must keep strict confidence in such matters.

3.7.8 Lists of students are not made public without the consent of the student or their legal guardian to other natural or legal persons or bodies, with the exception of appropriate State authorities, or unless otherwise stipulated by law.

3.7.9 For the purpose of creating School promotional materials, the School's Annual Report, the School Yearbook, on notice boards in the School, or the School website and other online forums, information about the student, including the name and surname, grade, and picture or recording of the student may be published only with the written consent of the student or their legal guardian, provided in the form issued by the School and provided as Annex 1 to this Policy, as amended. The student or legal guardian may exercise their erasure rights by informing the School.

3.7.10 The Head of School approves the software to be used by Employees for the administration of documentation, or for pedagogical purposes. Employees may not request or provide evidence of surplus data. In the event of a positive finding, such software will be reprogrammed to comply with the Personal Data Protection Regulation, or discontinued.

3.7.11 CCTV systems are not used by the School to monitor the use of the premises by students or school staff. However, at the entrance to the Primary Building there is a CCTV camera registered with the Office for Personal Data Protection (00061809) to monitor arrivals and departures from the building for safety reasons. The camera is monitored from the Deputy Head of Primary's office.

3.7.12 When concluding contracts with Third parties involving the provision of personal data, the School shall make every effort to ensure that the Third party:

- implement all security, technical, organizational and other measures, and take into account the nature of the processing, the scope of processing, the processing context and the processing purposes to prevent any disruption of the personal data provided,
- not involve any additional party in the processing without the prior written consent of the School,
- process personal data only for performance of the contract (including the transfer of data to third countries and international organizations); except for cases where certain obligations are imposed directly by a law,
- ensure that persons authorized to process personal data with a contractor are subject to a statutory duty of confidentiality,

- ensure that the contractor will assist the School without unnecessary delay in fulfilling the school's obligations, in particular the obligation to respond to requests for the exercise of rights of data subjects, the obligation to report violations of personal data security to the supervisory authority pursuant to Article 33 of the Regulation, the obligation to report violations of personal data under Article 34 of the Regulation, the duty to assess the impact on the protection of personal data under Article 35 of the Regulation and the obligation to conduct prior consultations under Article 36 of the Regulation, and to that end ensure or take appropriate technical and organizational measures,
- to handle the processed personal data properly, for example, by erasing all personal data or returning it to the School and deleting existing copies etc., after the termination of the contract
- provide the School with all the information needed to prove that the obligations laid down by the school have been met by law,
- allow control, audit or inspection by the School or a competent authority in accordance with legal regulations,
- cooperate, without undue delay or within a set time limit, with the school to meet the statutory obligations of the school related to the protection of personal data and their processing,
- protect personal data provided in accordance with the law,
- reasonably comply with this Policy, which is an annex to the contract.

4. Rules for the collection, organisation, use, storage, distribution and archiving of personal data

4.1 The School only processes and handles personal data

- related to the work and salary conditions of the Employees or contractual partners (education, length of experience, position, etc.), related to the social and health insurance, as well as information on the legitimacy of a foreign citizen to be employed in the territory of the Czech Republic (copies of the employment cards or passports),
- related to clear identification of the legal guardians of the student in relation to the law and the Learning Contract (name, surname, place of residence, contact, telephone number of the legal guardian in contact with the school for issues of health protection, the security and the rights of the student, and other data that may be necessary for issuing a decision, etc.)
- related to the identification of a student, given by law (date of birth, place of birth, birth number, nationality, place of residence, legal guardian's information, court decision relating to child custody, necessary medical data, etc...)

- that are necessary for the fulfillment of a legal obligations, protection of the legitimate interests of the school or in the public interest,
- for which it has gained consent from the Data Subject

4.2 Personal data shall only be kept for as long as necessary to achieve the purpose of its processing, including archiving.

4.3 Personal data may be accessed by persons authorized to do so by law, and by the staff of the school according to the organizational structure of the school - see below.

Individual school documents containing personal information, can be seen by:

- **An Employee's personal file** - by School management, The Labour Inspection Authority, the Labor Office, the Court, the Public Prosecutor, the competent authority of the Police of the Czech Republic, the National Security Office and the intelligence services

Employees have the right to inspect their personal files, to make excerpts from them and to obtain copies of the documents contained therein, at the expense of the employer (§ 312 of the Labor Code)

- **Student data for administration and academic processing** - teaching staff, administration assistants
- **Student health information, school-based examination reports, medical reports** - School's Leadership, Student Wellbeing Centre Coordinator, class teacher, First Aid Officer, authorized teachers
- **Documents subject to legal proceedings** - Governance, Leadership, Authorised individuals

5. Consent to the processing of personal data

5.1 For the processing of personal data beyond the scope of the law (a legitimate interest, fulfillment of a legal obligation, fulfillment of the contract, public interest), the consent of the person whose personal data is involved is necessary. Consent must be informed, concrete, and in written form. Consent is only obtained for specific data, for a specific time and for a particular purpose.

5.2 Consent is obtained for the processing of personal data only if the processing is absolutely necessary and the law does not provide any other reason for such processing.

5.3 Consent is always given according to the purpose for a specific period, for example, for the duration of a trip, school attendance or for a longer period of time in the consent given directly. The consent granted may be revoked in accordance with the law.

6. Certain responsibilities of the school, its employees, or Third parties when processing personal data

6.1 Every employee of the School is required to act in such a way that does not jeopardize the protection of personal data processed by the School.

6.2 Furthermore, each Employee is obliged:

- to prevent accidental and unauthorized access to the personal data of employees, students, their legal guardians and other persons, processed by the school,
- if he or she detects a violation of personal data protection, the unauthorized use of personal data, the misuse of personal data or other unauthorized actions related to the protection of personal data, to immediately prevent further unauthorized handling, in particular to ensure disincentives, and report this fact to the Head of School or other authorised employee.

6.3 The Head of School is obliged:

- to inform employees of any significant facts, practices or events related to the handling of personal data at School, without undue delay,
- ensure that staff are properly instructed about the rights and obligations to protect personal data,
- ensure that School staff are educated or trained on the protection of personal data according to the possibilities and needs of the School
- ensure that the School is able to duly demonstrate compliance with the legal obligations of the School's personal data protection responsibilities.

Annex 1 to the Data Protection Policy

Informed Consent for the Processing of Personal Data

I, the undersigned (name and surname)

born:

residing at:

as a legal representative of
my daughter/son (name and surname):

born:

residing at:

Grade Level:

(hereinafter referred to as the "child")

hereby give my consent to **The Ostrava International School, sro**, headquartered at **Gregorova 2582/3, 702 00 Ostrava, ID 028 15 303** (hereinafter referred to as the "School") for the collection, processing and recording of personal data and sensitive personal data about my child within the meaning of Regulation (EU) 2016/679, of 27 April 2016, on the Protection of Individuals with Regard to the Processing of Personal Data and on the free movement of such data and repealing Directive 95/46 / EC (General Regulation on the protection of personal data).

I give my consent solely to the processing of personal data that is necessary for the work of the school and to the extent necessary for the fulfillment of the following stated purposes:

* Circle the appropriate answer. If no answer is circled, it is assumed that the consent was not granted.

	Personal Data	Purpose for processing	Agree* YES / NO	Period of use
1.	name & surname, date of birth, grade level	lists of participants in school and out-of-school events for third-party providers (including the school lunch providers, in-school and out-of-school competitions, accommodation, entrance to buildings, tickets, ski passes, insurance, transport, etc...)	YES / NO	10 years after the specified event
2.	Child: photograph, name & surname, date of birth, home address, telephone number, name of school, email, sex	for the issuance of an ISIC Card	YES / NO	10 years after the specified event

	Parent /Guardian: Name and surname, email address, telephone number			
3.	photograph of your child, and/or a photograph in which your child is included	use of a photograph /photographs of your child for publication on: <ul style="list-style-type: none"> • The school’s web page • Social networks (facebook, instagram, youtube) • School marketing and promotional materials (leaflet, banner, roll up, poster) 	YES / NO	10 years after the photograph is taken
4.	photograph of your child, and/or a photograph in which your child is included	In school bulletin boards highlighting and promoting school events, projects, works of art, in order to promote the school and show samples of student excellence.	YES / NO	10 years after creation of the work.
5.	photograph of your child, and/or a photograph in which your child is included, including child’s name and surname	for posters in the offices of the Deputy Heads in Primary and Secondary	YES / NO	During study at the school
6.	photograph of your child, and/or a photograph in which your child is included	School Annual Report	YES / NO	10 years after creation of the Annual Report
7.	photograph of your child, and/or a photograph in which your child is included, including child’s name, surname and class	School Yearbook	YES / NO	10 years after creation of the Yearbook.
8.	photograph of your child, and/or a photograph in which your child is included, including child’s name, surname and class	Class photos and Graduation photos	YES / NO	10 years after creation of the photos
9.	Name & Surname	creating and using a school email in the form of: name.surname@tois.world	YES / NO	while attending

				school
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I grant consent for the periods mentioned above and for the time required by law for their processing and archiving. I grant consent only for the needs of the school which, without my consent or by legally established cases, cannot provide the above listed personal and sensitive personal information to other persons and authorities, and must protect this data from unauthorized or accidental access and processing, change or destruction, misuse or loss.

I am aware of the fact that the provision of personal data is voluntary, and of my rights:

- to withdraw this consent at any time, without providing a reason
- to access this data
- to update or adjust the data
- to be informed about which personal data were processed and for what purpose.

I am also aware that if I discover or come to believe that the controller or processor carrying out the processing of the personal data listed above in a manner that is contrary to the privacy of the data subject or contrary to the law, or that the personal data is inconsistent with regard to the purpose of its processing, I may ask the said institutions for an explanation, and require the administrator or the processor to resolve the resulting situation. This may include blocking, repairing, supplementing or disposing of the personal data listed above.

Signature of parent / guardian

Date

Signed in