



BRITANNICA INTERNATIONAL SCHOOL, SHANGHAI

## Personal Data Protection Policy

<b>Approved by:</b>	Michael Clack	<b>Date:</b> July 2024
<b>Last reviewed on:</b>	July 2024	
<b>Next review due by:</b>	July 2025	

The School holds data and information about Parents, guardian and/or the Student including but not limited to contact details, financial information, exam results, biometric information and details of medical conditions. This Information is kept electronically on the School's information management system (iSAMS) or manually in indexed filing systems.

The School processes Information about Parents and the Student in order to safeguard and promote the Student's welfare, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with.

Examples may include: the School keeping details of medical conditions from which the Student may suffer so that staff will be able to respond appropriately in the event of a medical emergency, and/or the School processing financial information obtained from the parents or from third parties such as credit reference agencies or the School using biometric information to allow students access in to School buildings.

This Personal Data Protection Policy will explain to you how the School collect and use your and/or the Student information. Please ensure that you read and fully understand this Policy. If there are any doubts as to the content of this Policy, kindly inquire through the method set out under this Policy and the School will provide the necessary clarification. If you accept the offer letter or did not raise any query after the School updated the content of this Policy, you are deemed to have agreed to this Policy and agreed to the School collecting and using the Information in accordance with the terms of this Policy.

## **1. Collection and Usage of Information**

- a) In order for the School to process the applications and manage the affairs of the Students, the School may need to process the Information for the purposes set out below:
  - i. **Application for Admission Consultation**  
When submitting application for the School admission consultation sessions, You will need to provide the School with the name, gender, date of birth, nationality and enrollment year of the Student, Parents and/or guardian name, Parents and/or guardian-Student relationship, Parents and/or guardian mobile phone number, Parents and / or guardian email etc.
  - ii. **Submission of Application and Application Documents**  
When submitting application for admission, you will need to provide us with the name, gender, nationality, date of birth, passport information, Chinese visa information, enrollment year, education background, grades, awards and past school performance record of the Students; names, education background, date of birth and contact details of family members; name, date of birth, education background, contact details of the Student's referee, etc.

iii. Fee Payment and Refund

The School may collect Your bank account information or third-party payment platform account information, transaction serial number, payment status and other information from you in order for the School to collect the student's application fee, tuition fee, school bus fees, extracurricular activities fees, pre-payment fees and other school-related fees from You and to make relevant refund to you.

iv. Medical Information

The School will collect the Student's medical information in order to understand the health and medical condition of the Students for the purpose of managing the Student's affairs. This information will involve the privacy of the Student, such as the Student's name, chosen name, gender, date of birth, home address, phone number and other personal data, name of family members and their contact details, blood type, eating habits and dietary restrictions; history of illness (including psychological and physical), injury history and treatment condition, matters to be noted by teachers and nurses, allergies, medication and medical information; sports restrictions; vision and vision correction condition, vaccination, insurance information such as issuer, insurance policy number, designated hospitals, etc.

v. Other Application Forms

You will need to provide Yours and/or the Student's name and home address, Parents'/ guardian's contact information, dietary requirements, photo to the School or third party service providers, if You or the Student requires other services from the School, such as boarding, school bus services, catering services, school uniforms, School access identification badge etc.

vi. Daily Communication and Contact

The School will contact the You or the Student via the contact details provided by You in order to communicate with You with regard to information/ development of the School and Students.

vii. Miscellaneous

Where, in the professional opinion of the Principal it is deemed necessary the School may share information with certain third parties.

b) If the School enters into a separate arrangement for the payment of fees, it may, in order to verify Parents' identity and so that it can assess an application for credit, search the files of any licensed credit reference agency who will keep a record of that search and details about an application. This record will be seen by other organisations which make searches about the Parents. Failure to supply information may result in a refusal of credit.

c) The School may use the personal information submitted by Students/Parents to the School or photos, videos, audios and other materials of Parents/Students participating in learning programmes, daily life and activities inside and outside the School for the purpose of marketing. The School

Group will use the personal data submitted by You to send You news briefings, latest news and promotional materials. The School Group may also publish photos, videos, audios and other materials containing you or Students in various online and offline marketing channels, such as the School's or the School Group's internal and external medias, websites, exhibitions, prints, visual displays, etc. If You would like to withdraw Your consent in relation to such use, kindly contact the School via the manner set out in paragraph 8 of this Policy.

## **2. Storage of Information**

- a) The information the School collect will be stored on servers located in the People's Republic of China (for the purpose of this Policy, excluding Hong Kong, Macau, and Taiwan) ("PRC"). At the same time, in order for the School to provide effective management and maintain the quality of education, the School may provide the data collected to headquarters of the School management company, Orbital Education.
- b) For the data collected, the retention period is the minimum time necessary to realize the operation functions of the School, and the School will abide by the laws and relevant regulations strictly. Upon the expiration of the retention period, or Your information is no longer needed for the purposes of this Policy, or when it is not required to be retain in accordance with relevant laws and regulations, the School will take reasonable steps and safe mode to remove personal information or make it unrecognizable and cannot be edited, modified or used again.

## **3. Information Sharing, Transfer and Disclosure**

### **a) Information Sharing**

The School will not share Information provided by You with any third parties without Your consent, except for the following:

- i. Share when obtained express consent: with Your prior consent, We will share Your Information with other parties;
- ii. Disclosing your Information to third party or administrative and judicial authorities in accordance with the relevant laws and regulations or the requirements of the administrative and judicial authorities.
- iii. Sharing with third-party suppliers: Some of the School's services will be provided by third-party suppliers where necessary. For example, school web design suppliers, school software design suppliers, marketing and public relations companies, catering suppliers and school uniform suppliers etc. The School will only share Your Information with third-party suppliers for specific and clear purposes based on legitimate, proper and necessary principles, and the School will only share Information which is necessary to provide services. The School will

request its suppliers to comply with this Policy and any other relevant confidentiality and security measures when processing Your Information.

- iv. For the purpose of providing service to You, the School may need to disclose Your Information to its affiliates.

For external organisations and individuals with whom the School share your information, the School will include confidentiality clauses in the agreements with them and require them to strictly handle Your Information in accordance with relevant confidentiality and security measures.

#### **b) Transfer of Information**

The School will not transfer Your personal data to any company, organisation and individual save for the following:

- i. Transfer with explicit consent: Upon obtaining Your explicit consent, the School will transfer Your personal information to other parties;
- ii. When it involves mergers, acquisitions or bankruptcy liquidation, if it involves the transfer of personal information, the School will require the new entity holding Your Information to continue to be bound by this Policy, otherwise the School will request the said entity to obtain Your authorised consent again.

#### **c) Public Disclosure**

The School will only disclose your Information under the following circumstances:

- i. Upon obtaining your express consent;
- ii. Disclosure based on law: In the case of mandatory requirements by laws, legal procedures, lawsuits of government authorities, the School may disclose Your Information publicly.

### **4. Protection of Information**

- a) The School will deploy an access control mechanism to ensure that only authorized personnel can access personal information; and the School will organize security and privacy protection training courses to enhance employees' awareness of the importance of protecting personal information.
- b) The School will take all reasonable and feasible measures to ensure that irrelevant personal data is not collected. The School will only retain Your personal data for the period required to achieve the purpose stated in this Policy, unless the retention period needs to be extended or permitted by law.

- c) In the unfortunate event of the occurrence of a personal data security incident, the School will promptly inform You in accordance with the requirements of laws and regulations: the basic information and possible impact of such incident, the measures the School has taken or will take, suggestions You may adopt separately to prevent and reduce risks, remedies for You, etc. The School will promptly inform You about the incident by email, letter, phone, push notification, etc. If it is difficult to inform the owners of the personal data individually, the School will adopt a reasonable and effective method to publish such notification.
- d) At the same time, the School will proactively report the handling of personal data security incidents in accordance with the requirements of the regulatory authorities, such as network information department, telecommunications department and police.

## 5. Your Rights

- a) Enquiry  
You can inquire and manage (including amending, deleting, changing or withdrawing the authorisation, etc.) the information You submitted to us by visiting the School in person. Please contact the School's admissions department for appointments.
- b) Amendment  
You should ensure that all information submitted to the School is accurate. If You find that the School have made errors in the collection and storage of the Information, You may request the School to correct the relevant Information in the manner set out in paragraph 5(a) above.
- c) Removal  
If You discovered that the School has not collected and used the Information in accordance with the provisions of laws and regulations or the provisions of this Policy, You may contact the School through the methods set out in paragraph 5(a) above to request for removal of the relevant Information.
- d) Amendment or Withdrawal of Authorisation  
For information collected for the purpose of marketing, You may amend or withdraw the authorisation previously provided by You. You may manage Your authorisation in the manner set out in paragraph 5(a) above. When You withdraw your authorisation, the School will no longer process Your corresponding Information. However, your decision to withdraw Your authorisation will not affect the Information previously processed based on Your authorisation.
- e) For security reason, You may need to provide a written request or prove your identity when you make inquiries or submit for changes or deletion of Your Information. The School may ask You to verify Your identity before processing Your request.

## 6. Personal Data belongs to Children

The School understand that the personal data of the Students it collects and uses may be minors under the age of 14 (PRC definition) The School places great importance to the protection of Children's personal data. The School will comply with the relevant laws and regulations strictly and fulfill its responsibility in protection of Children's personal data. The School agrees to the following:

- a) Children shall not set up his or her own online account with the School without the consent of his/her parents or guardian.
- b) Before collecting Children's personal data, the School will remind parents or guardians of the Child to read this Policy and inform them about the collection, storage, use, transfer and disclosure of Children's personal data in accordance with relevant laws and regulations.
- c) The School will only collect and use Children's personal data in strict compliance with the relevant laws and regulations and this Policy provided that authorization and consent of the Child's parent or guardian has been obtained. The School will not collect Children's personal data unrelated to the operation of the School.
- d) The School will store Children's personal data in the manner and within the time limit specified in paragraph 2 of this Policy. The School will not store Children's personal data beyond the time limit necessary for the purpose of collection and use.
- e) The School will not use Children's personal data in violation of the relevant laws and regulations or the agreed purpose and scope. If it is necessary to use the data beyond the agreed purpose and scope to facilitate School operation, the School will obtain the consent of the Child's parent or guardian again.
- f) The School will set up strict data access authority and control the scope of Children 's personal information based on the principle of minimum authorisation.
- g) Children and their parents or guardians enjoy the rights as specified in paragraph 5 of this Policy.
- h) The School will designate an officer to be responsible for the protection of Children 's personal data. If You have any questions, you may contact the School in accordance with the provisions of paragraph 8 of this Policy.

## **7. Amendment of Policy**

The School may revise this Policy from time to time to comply with the changes in the relevant laws, regulations and regulatory policies. The revised Policy will be published on the School's website or sent to your email account. If You did not raise any queries after the publication or upon receiving the revised Policy, you are deemed to have fully read, understood and accepted the revised Policy.

## **8. How to Contact the School**

If You have any questions, comments, suggestions or complaints relating to this Policy or Your information, you may contact the School by contacting the School's Admissions Department. Contact details are available on the School's website.