

Privacy Policy



Privacy Policy for the German International School The Hague

1. Applicability	This policy applies to the entire organisation which forms part of the German International School The Hague, located at van Bleiswijkstraat 125 in The Hague.
2. Definitions	
<i>Personal data</i>	Any information about an identified or identifiable natural person ('the data subject'), such as name, address, date of birth, title(s), gender, address, telephone number, e-mail address, position, employee number, medical reports, e-mail content, performance/grades, letters, complaints, photographs, videos, IP addresses, tracking cookies, login names and passwords.
<i>Processing of personal data</i>	An operation or set of operations which is performed upon personal data or sets of personal data, automated or manual, such as collection, recording, organising, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, dissemination or any other form of posting, merging, linking as well as blocking, erasing or destroying data.
<i>Special personal data</i>	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data (DNA/RNA) or biometric data (e.g. photographs) for the unique identification of a person, and data concerning health or a person's sexual orientation or conduct.
<i>Data subject</i>	The person to whom the personal data relates and who may or may not be represented by a legal representative. Data subjects can be, for example: pupils, parents, employees and visitors.
<i>Legal representative</i>	The person who exercises parental authority over a minor. This will usually be a parent, but it could also be a guardian. If a student is 16 years or older, he or she decides about their own privacy where appropriate.
<i>Controller</i>	The entity that determines the purposes and means for the processing of personal data. For the purposes of this Policy, the competent authority, namely the German International School The Hague, is represented by the Executive Board, the controller.
<i>Processor</i>	The natural or legal person who processes personal data on behalf of the controller (the German International School The Hague), such as the supplier of a pupil monitoring system or pupil administration system. A processor has an executive task for the benefit of the activities of the controller.
<i>Other interested parties</i>	A natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or persons who, under the direct authority of the controller or the processor, are authorised to process personal data.
COMPETENT AUTHORITY	The German International School The Hague; the controller within the meaning of this Policy.
3. Scope and objective	1. This Policy lays down the rules on the processing of personal data of all parties involved with the organisation, including pupils and their legal representatives, employees, visitors and external relations (e.g. suppliers and contractors).

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2. This Policy applies to all personal data of the data subject which are processed by the German International School The Hague. The purpose of the Policy is:
- to protect the privacy of data subjects against misuse and unintended use of personal data;
 - to determine for what purpose and on what (legal) basis personal data will be processed within the German International School The Hague;
 - to also guarantee that personal data will be processed lawfully, transparently and properly within the German International School The Hague;
 - to lay down the rights of the data subjects and to ensure that these rights are respected by the German International School The Hague.

4. Purposes of personal data processing

When processing personal data, the German International School The Hague is compliant with the relevant legislation and regulations, including the General Data Protection Regulation (GDPR), the GDPR Implementation Act and the educational legislation.

Purposes

1. Personal data processing takes place for the benefit of:
- the organisation or the provision of education, guidance of pupils, the provision of (additional) support or the provision of study advice;
 - the provision of educational resources and/or making those available;
 - monitoring the safety within schools and protecting the property of employees, pupils and visitors;
 - publishing information about the organisation and educational resources as referred to in points a and b as well as information about pupils on their own website;
 - publishing the activities of the organisation, for example on the website of the German International School The Hague or of the schools, in brochures or the school guide or through social media;
 - calculating, recording and collecting enrolment fees, school and tuition fees and contributions or fees for educational resources and extracurricular activities, including the collection of claims by third parties;
 - requesting funding, treating disputes about that and the exercise of audit;
 - maintaining contact with former students;
 - entering into and performing employment agreements, cooperative relationships with contractors and contracts with suppliers;
 - implementation or application of laws and regulations;
 - legal proceedings involving the German International School The Hague.
2. Personal data processing may also be carried out for purposes compatible with those set out in paragraph 1.

5. Purpose limitation

Personal data will only be used to the extent that their use is compatible with the defined processing purposes. The German International School The Hague does not process more data than necessary to achieve the related purposes.

6. Types of personal data

The categories of personal data as processed within the German International School The Hague are registered in a processing register.

7. Basis of the processing

Personal data will only be processed if one of the following conditions is met:

- Processing is necessary for the performance of a task in the public interest or a task connected with the exercise of official authority entrusted to the German International School The Hague.
- Processing is necessary in order to comply with a legal obligation incumbent on

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the German International School The Hague.

- c. Processing is necessary for the performance of a contract to which the data subject is party (the employment contract, for example) or in order to take action at the data subject's request prior to the conclusion of a contract.
- d. Processing is necessary in order to protect the legitimate interests of the German International School The Hague or those of a third party, except where the interests or fundamental rights and freedoms of the data subject are more important, in particular where the data subject is a child, in which case the balance of interests will have to take place in the context of this basis.
- e. Processing is necessary to protect the vital interests of the data subject or those of another natural person.
- f. The data subject has given their consent to process their personal data for one or more specific purposes.

9. Retention periods

German International School The Hague does not store personal data longer than necessary for the purpose for which they are processed, unless retention of the personal data is required by law or regulations.

10. Access

Within the German International School The Hague organisation, individuals only have access to personal data to the extent that such is actually necessary. Access of employees to personal data is therefore limited to the data that is necessary for proper performance of their function and (therefore) their activities. In addition, access is granted only to personal data contained in the school's administration and systems to:

- a. the processor who has been instructed by the German International School The Hague to process personal data, but only to the extent necessary in the light of the agreements made;
- b. third parties in so far as it follows from the law that the German International School The Hague is obliged to grant access or that there is a (different) basis for such processing, for example performance of a task in the public interest.

11. Security and confidentiality

1. The German International School The Hague takes the appropriate technical and organisational security measures to prevent damage to, loss of or unlawful processing of personal data. The measures are also aimed at preventing unnecessary collection and further (unnecessary) processing of personal data.
2. Security measures take into account the state of the art, the implementation costs, the context and the processing purposes as well as the various risks with respect to likelihood and severity regarding the rights and freedoms of data subjects.
3. Anyone involved in personal data processing within the German International School The Hague is obliged to maintain confidentiality of the relevant personal data and will only process these data to the extent necessary for the performance of the relevant function, work or task.

12. Providing data to third parties

The German International School The Hague may provide personal data to third parties if there is a basis for doing so within the meaning of Article 7 of this Policy.

13. Social media

For the use of personal data on social media, separate agreements have been made in the social media protocol of the German International School The Hague.

14. Rights of data subjects

1. The German International School The Hague recognises the rights of data subjects, acts in accordance with those rights and ensures that data subjects can effectively exer-

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cise those rights. These rights particularly include the following:

Right of access

- a. A data subject has the right to access personal data relating to them processed by the German International School The Hague, except in case of working documents, internal notes and other documents intended solely for the purposes of internal consultation and deliberation. If and insofar as this right of access also affects the rights and freedoms of others, for example if the documents also contain personal data of persons other than the data subject, the German International School The Hague may restrict the right of access.

When providing this information, the German International School The Hague also provides information on the following:

- the processing purposes;
- the categories of personal data that are processed;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- recipients (where applicable) in third countries or international organisations;
- (if possible) how long the data will be retained;
- that the data subject has the right to request that the personal data be rectified or erased, or that the processing of personal data be restricted, and that he or she has the right to object to the processing of personal data;
- the fact that the data subject may lodge a complaint with the Dutch Data Protection Authority (AP);
- the source of the personal data, if the personal data have not been obtained from the data subject directly;
- the possible use of automated decision-making and the relevant underlying logic as well as the interest of and consequences for the data subject;
- the appropriate safeguards should the personal data be transferred to a third country or an international organisation.

Rectification, addition, deletion

- b. German International School The Hague rectifies the personal data of a data subject in case the data subject has rightly indicated that the data are inaccurate, and German International School The Hague rectifies the personal data of a data subject in case the data subject has legitimately requested an addition. Furthermore, the data subject may request deletion of their personal data. The German International School The Hague undertakes to do so when a legal basis for the request has been met, unless it is impossible to comply with the request or if such would involve an unreasonable effort.

Objection

- c. If the German International School The Hague processes personal data based on Article 7(a) or Article 7(d) of this policy, the data subject may object to the processing of their personal data. In that case, the German International School The Hague will stop processing the personal data in question unless, in the opinion of the German International School The Hague, the interests of the German International School The Hague, the interests of third parties or the general interests of the case in question are more important.

Limiting the processing

- d. The data subject may further request that the processing of their personal data be restricted, namely if they requested rectification, if they have objected to the processing, if the personal data are no longer necessary for the processing

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Notification requirement

purpose or if the data processing is unlawful. The German International School The Hague will then cease processing, unless the data subject has consented to the processing, The German International School The Hague requires the data for legal proceedings or should processing be necessary to protect the rights of another person or for important reasons.

- e. Once the German International School The Hague, at the request of a data subject, has rectified or deleted personal data or restricted the personal data processing, the German International School The Hague will inform any recipients of the personal data in question accordingly.

Procedure

2. The German International School The Hague deals with a request made by a data subject as soon as possible, and in any event within one month of receipt of the request. Depending on the complexity and the number of requests, this period may be extended, if necessary, by two months. If this extension takes place, the data subject will be informed within one month of receipt of the request. Should the data subject submit their request electronically, the information will be provided electronically, if possible, unless the data subject requests otherwise. Should the German International School The Hague not comply with the request made by the data subject, the German International School The Hague will, without delay and at the latest within one month of receipt, inform the data subject of the reasons for not complying with the request and of the possibility to lodge a complaint with the Dutch Data Protection Authority (AP) or to appeal in court.

Withdrawal of permission

3. Should prior consent be required to process personal data, such consent may be withdrawn at any time by the data subject or by their legal representative. If consent is withdrawn, the German International School The Hague will cease to process personal data, unless there is another basis (as referred to in Article 7) to process the data. Withdrawal of consent does not affect the lawfulness of processing operations which have already taken place.

15. Transparency

The German International School The Hague actively informs the data subject(s) about the processing of their personal data, in any case by means of an easily understandable Privacy Statement. The Privacy Statement will contain at least the following information:

- (a) the contact details of the German International School The Hague;
- (b) the contact details of the Data Protection Officer of the German International School The Hague;
- (c) the purposes of the data processing and the processing bases;
- (d) a description of the interests of the German International School The Hague if the processing is based on the legitimate interest of the German International School The Hague;
- (e) the (categories of) recipients of the personal data, such as processors or third parties;
- (f) where applicable, whether the personal data will be transmitted to countries outside the European Economic Area (EEA);
- (g) the period of time for which personal data will be retained;
- (h) that the data subject has the right to request the German International School The Hague access to, rectification or deletion of personal data and that they have the right to request that the processing be limited, the right to object or the right to invoke data portability;
- (i) that the data subject has the right to withdraw their consent if the processing is based on consent;

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- (j) that the data subject has the right to lodge a complaint with the Dutch Data Protection Authority (AP);
- (k) whether provision of the personal data is a legal or contractual obligation or a necessary condition to conclude a contract, and whether the data subject is obliged to provide the personal data and what the consequences are should they choose not to provide the personal data;
- (l) the existence of automated decision-making accompanied by useful information on the underlying logic as well as the interest and anticipated impact of such processing for the data subject.

16. Obligation to report data leaks

Anyone involved in personal data processing is obliged to immediately report a data leak to the contact point (privacy@disdh.nl) in accordance with the security incident and data leaks protocol of the German International School The Hague. A data leak is any leak where personal data is destroyed or lost, altered, transmitted or made available.

17. Complaints

1. Should a data subject be of the opinion that actions or inactions by the German International School The Hague are not in accordance with the GDPR, this Policy or (other) applicable laws or regulations, a complaint may be lodged in accordance with the complaints procedure applicable within the German International School The Hague. A data subject can also contact the Data Protection Officer of the German International School The Hague.
2. If, in the opinion of the data subject, a complaint has not been dealt with correctly by the German International School The Hague, they may approach the court or the Dutch Data Protection Authority (AP).

18. Unforeseen situation

Should a situation arise that is not described in this Policy, the German International School The Hague's Executive Board will take the necessary measures and assess whether this Policy needs to be supplemented or amended as a result.

19. Amendments to the Policy

1. This Policy was established by the German International School The Hague's Executive Board after approval of the KBR. The Policy is published on the website of the German International School The Hague. The Policy is also actively promoted, for example by means of reference in general communications and meetings.
2. The Executive Board may amend this Policy after approval of the KB.

20. Final provision

This Policy is cited as the Privacy Policy of the German International School The Hague and enters into force on **[24.05.2018]**.