



ST. JULIAN'S
SCHOOL

St. Julian's School Data Protection Policy

Version:

June 2022



INDEX

1. Introduction	4
2. Need to know (basic concepts of the GDPR)	4
What is a Personal Data?	4
Special category of Personal Data	4
International	6
3. Individuals rights	6
4. St. Julian's School steps to ensure compliance with GDPR	9
4.1 Appointing a DPO	9
4.2 Raising awareness	9
4.3 Information St. Julian's school holds (data audit)	9
4.4 Communicate privacy information	10
4.5 Processing	10
4.6 Privacy by design, by default and data protection impact assessments (DPIAS)	10
4.6 International transfers	13
4.7 Data transfers to subcontractors	14
5. Processing data of data Subjects	14
5.1 Lawful basis for processing personal data	15
5.2 Consent	16
5.3 Human Resources Candidates data	17
5.4 Human Resources Employees	19
5.5 Student 's personal data	22
5.6 Personal data of parents/guardians	25
5.7 Personal data of former students (ALUMNI)	28
5.8 What about Data Subjects under the age of 18?	30
6. Data Breaches	30
7. Roles and Responsibilities	31
Board of Management	32
GDPR Governance Team	32



Teaching Staff / Caretakers / Security	32
Clerical staff / Receptionist / School Secretary	33
IT	34
School nurse / Medical doctor	34
8. Special concerns on photographs/videos, apps and social media publications	35
Use of apps in the educational environment	35
Use of cloud storage systems in the educational environment	35
Photographs and videos taken inside School premises	36
Use of social networks and the website of St. Julian's School	39
9. Final Considerations/Provisions	40



1. Introduction

Since May 25th of 2018, the law regarding data protection has changed. While many of the principles and ideas remain the same, the new General Data Protection Regulation (GDPR) has strengthened the rights of data subjects regarding their privacy and the responsibilities of organizations to uphold these rights.

This document provides the steps that can help an efficient development of the St. Julian's School community culture, processes and documentation required to be compliant with the strengthened legislation and effectively manage the risks associated.

These steps will enable St. Julian's School to identify and monitor the use of personal data, undertake the necessary processes for auditing and assessing risk and assist with compiling policies to ensure compliance.

2. Need to know (basic concepts of the GDPR)

What is a Personal Data?

Personal Data is any information, including documents, video footage or genetic material, that relates to an identified or identifiable natural person ('data subject') directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special category of Personal Data

There is a subset of personal data referred to as Special Categories of Personal Data. The processing of this category of personal data is more sensitive because it can be more intrusive for data subjects' privacy and for that needs more protection.

This concept is not *numerus clausus*. Nevertheless, GDPR states that the following categories of personal data are considered sensitive data:

- Racial or ethnic origin,
- Political opinions,
- Religious or philosophical beliefs,
- Trade union membership,
- Genetic and biometric data,



- Health related data, or
- Data concerning a person's sex life or sexual orientation.

To instate the required need for additional protection, GDPR states that in order to lawfully process personal data, we need to identify:

1. A lawful basis under Article 6 GDPR; and

Article 6

Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:
 - (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
 - (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
 - (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
 - (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
 - (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
 - (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

2. A separate condition for processing special category data under Article 9 GDPR.

There are ten conditions for the processing of special category of personal data under Article 9 GDPR:

Article	Condition
9(2)(a)	Under explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law
9(2)(b)	Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
9(2)(c)	Processing is necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent
9(2)(d)	Processing carried out by a non-profit organization with a political, philosophical, religious or trade union aim provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent
9(2)(e)	Processing relates to personal data manifestly made public by the data subject
9(2)(f)	Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
9(2)(g)	Processing is necessary for reasons of substantial public interest on the basis of Union or Member State law which is proportionate to the aim pursued and which contains appropriate safeguards

9(2)(h)	Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional
9(2)(i)	Processing relates to public interest in the area of public health
9(2)(j)	Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)

International

The GDPR not only applies to organizations located within the EU but also applies to organizations located outside of the EU if they offer goods or services or monitor the behavior of EU data subjects. It applies to all companies processing and holding personal data of data subjects residing in the European Union, regardless of the company's location. The GDPR also applies to the processing of personal data of data subjects inside the EU by a controller or processor not established in the EU, where the activities relate to: offering goods or services to EU citizens and the monitoring of behavior taking place within the EU territory.

3. Individuals rights

All data subjects can request St. Julian's School to comply with a request to exercise their rights, which are:

RIGHT TO BE INFORMED (GDPR Article 13)

The right to be informed encompasses St. Julian's School obligation to provide 'fair processing information', typically through privacy notices at the moment personal data is being collected.

The GDPR sets out the information that should be given and when individuals should be informed.

The information given about the processing of personal data must be:

- Concise, transparent, intelligible and easily accessible;
- Written in clear and plain language, particularly if addressed to a child; and
- Free of charge.

All St. Julian's School forms where personal data is being collected should have simple and clear privacy notices making effective this right to be informed.



RIGHT OF ACCESS (GDPR Article 15)

This is the right for data subjects to obtain from St. Julian's School confirmation as to whether or not their personal data is being processed, where and for what purpose. Further, St. Julian's School shall provide a free of charge copy of the personal data, preferably in an electronic format.

Data subjects have the right to obtain:

- Confirmation that their data is being lawfully processed;
- Access to their personal data; and
- Supplementary information if needed.

RIGHT TO RECTIFICATION (GDPR Article 16)

Data subjects are entitled to have their personal data rectified if said data is inaccurate or incomplete.

If St. Julian's School discloses personal data to third parties, they must inform them of the rectification when possible. St. Julian's School must also inform the data subjects about the third parties to whom the data will be disclosed at the time of collection.

RIGHT TO BE FORGOTTEN (GDPR Article 17)

The right to be forgotten entitles the data subjects to request from St. Julian's School the erasure of their personal data and the ceasing of further processing.

The right to be forgotten shall only be taken into account whenever there isn't any other lawful basis for the preservation and further processing of said data.

Every request to exercise this right should be previously sent to St. Julian's School Data Protection Officer (DPO) in order to prevent irreversible data loss.

RIGHT TO RESTRICT PROCESSING (GDPR Article 18)

In some situations, this right gives the data subject an alternative to requiring data to be erased; in others, it allows the individual to require data to be held in "limbo" whilst other issues are handled.

If the data subject requests the restriction of some processing of certain categories of personal data, St. Julian's School may only store these data until the issue is solved.

Where data are being processed automatically, the restriction should be done through technical means. This could mean moving the data to a



separate system; temporarily blocking the data on a website or otherwise making the data unavailable.

If the data have been disclosed to others, St. Julian's School must notify those recipients about the restriction of processing request, unless doing so is impossible or involves disproportionate effort.

RIGHT TO DATA PORTABILITY (GDPR Article 20)

The right to data portability allows data subjects to request the transfer of the personal data they have provided in order to transfer it to another organization. This request can be made effective directly between organizations or by giving the data subject a complete file with all his personal data.

RIGHT TO OBJECT (GDPR Article 21)

The data subject shall have the right to object to the processing of his personal data on grounds relating to his particular situation.

St. Julian's School shall not process the personal data unless:

- the school demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject
and/or
- for the establishment, exercise or defense of legal claims.

RIGHT TO COMPENSATION & LIABILITY (GDPR Article 82)

Data subjects can take legal action both against controllers and processors for compensation for pecuniary or non-pecuniary damage (e.g. damages for distress) suffered as a result of unlawful processing of their personal data. Data subjects will have a right to recover material and/or non-material damages including loss of control over personal data or limitation of rights, discrimination, financial loss, damage to reputation, loss of confidentiality of personal data protected by professional secrecy and "other significant economic or social disadvantage".

In the event that such rights are exercised St Julian's School will endeavor to ascertain clearly the identity of the requesting data subject.



4. St. Julian's School steps to ensure compliance with GDPR

4.1 Appointing a DPO

St Julian's School has appointed a Data Protection Officer to ensure its compliance with the GDPR.

1.The data protection officer shall have at least the following tasks:

(a) to inform and advise St Julian's management and remaining staff who carry out processing, of their obligations pursuant to the GDPR and to other Union or Member State data protection provisions;

(b) to monitor compliance with the GDPR, with other Union or Member State data protection provisions and with the policies of St Julian's School in relation to the protection of personal data, including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits;

(c) to provide advice where requested as regards the data protection impact assessment and monitor its performance pursuant to Article 35 of the GDPR;

(d) to cooperate with the supervisory authority;

(e) to act as the contact point for the supervisory authority on issues relating to processing, including the prior consultation referred to in Article 36, and to consult, where appropriate, with regard to any other matter.

2.The data protection officer shall in the performance of his or her tasks have due regard to the risk associated with processing operations, taking into account the nature, scope, context and purposes of processing.

An internal document on how and when to contact the DPO is to be made available to all personnel and student community.

4.2 Raising awareness

Raising awareness on data protection matters is a big step towards GDPR compliance.

St. Julian's School makes sure that decision makers and key people in the organization are aware of GDPR.

4.3 Information St. Julian's school holds (data audit)

St. Julian's School documents what personal data is held, where it came from and with whom it is shared.



4.4 Communicate privacy information

St. Julian's School reviewed their privacy notices and updated internal procedures in order to comply with GDPR. When St. Julian's School collects personal data, there's an obligation to provide certain information, such as the controller identity and how the school intends to use their information.

4.5 Processing

Processing is defined as “any operation or set of operations which is performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;”. **This means anything you do with personal data, including deleting or archiving, constitutes processing it.**

4.6 Privacy by design, by default and data protection impact assessments (DPIAs)

The GDPR places onerous accountability obligations on organizations to demonstrate compliance. This includes requiring them to:

- (i)** maintain certain documentation,
- (ii)** conduct a data protection impact assessment where more risky processing takes place (such as CCTV, biometric control, profiling, digital marketing, etc.), and
- (iii)** implement data protection by design and by default.

In this sense, St. Julian's School must ensure that privacy concerns are a key part of their decision making. The GDPR seeks to ensure that the privacy rights of data subjects are prioritized by data controllers when they make internal or business decisions.

St. Julian's School will have to carry out privacy impact assessments for any actions that may pose a high risk for data subjects' privacy rights. GDPR has introduced mandatory DPIAs (Art. 35) for the first time. Under the Regulation, businesses will be obliged to conduct Data Protection Impact Assessments (“DPIA”) where the processing, particularly where it utilizes any new technologies, “is likely to result in a high risk” for the rights of individuals, having regard to the “nature, scope, context and purposes of the processing”.

What is a DPIA?

DPIAs are prospective diligences and act as an early warning system which may affect the design/end result of a new project or practice. The final



objective is to identify and reduce the privacy risks and help on the decision-making process.

Objectives:

- Minimize risks
- Prevent unlawful processing
- Implement privacy by design and by default

What triggers a DPIA?

Under Article 35(1) of the GDPR, the processing of personal data likely to entail a high risk to the rights and freedoms of natural persons must be preceded by a DPIA.

The European legislator defines, by way of example, three types of situations which fulfill the conditions of this obligation of the data controller and which are laid out in Article 35(3) of the GDPR.

- a) Systematic and complete assessment of personal aspects relating to natural persons, based on automated processing, including profiling, and decisions which have legal effects on the natural person or which significantly affect the natural person are adopted;
- b) Large-scale processing of special categories of data referred to in Article 9(1) or personal data relating to criminal convictions and offences referred to in Article 10; or
- c) Systematic control of large-scale publicly accessible areas.

Thus, in addition to those provided for in Article 35(3) of the GDPR, the local portuguese data protection authority (CNPD) determined additional examples of processing of personal data that is subject to a prior DPIA, (Regulamento n1/2018 relativo à lista de tratamentos de dados pessoais sujeitos a Avaliação de Impacto sobre a Proteção de Dados) as listed below:

- a) Processing of the data provided for in Article 9(1) or Article 10 of the GDPR for purposes or purposes other than that originally justified by its collection (in particular for the purpose of public-interest archive, scientific research or statistical purposes), with the exception of treatments provided for and regulated by law which provide adequate guarantees of the rights of the holders and is preceded by an impact assessment on data protection;
- b) Processing of information arising from the use of sensors or other electronic devices transmitting, by communication networks, personal data, with legal effects on the sphere of their owners or significantly affecting them in a similar way, in particular to allow analysing or predicting the location and movements, personal



tastes or interests, consumption or other behavior and health (e.g., medical devices implanted or applied to people);

- c)** Interconnection of personal data or processing relating personal data provided for in Article 9(1) GDPR;
- d)** Processing of personal data on the basis of indirect collection of personal data where it is not possible or feasible to ensure the right of information pursuant to Article 14 of the GDPR;
- e)** Processing of personal data involving or consisting of large-scale profiling;
- f)** Processing of personal data to trace the location or behavior of their owners (e.g. workers, customers or only passers-by), except where processing is indispensable for the provision of services specifically requested by customers;
- g)** Processing of biometric data for the unambiguous identification of its data subjects, with the exception of treatments provided for and regulated by law that has been preceded by an impact assessment on data protection;
- h)** Processing of personal data using new technologies or new use of existing technologies;
- i)** Significant change in the architecture of the information system on which the processing of personal data is based.

It is stressed that this list is not exhaustive and that other situations may also arise, in particular depending on technological development, in which it is justified, in accordance with Article 35(1), to carry out the DPIA. This is a dynamic list, being updated whenever it is necessary.

Those responsible for the treatment should pay due attention that the performance of such impact assessment does not exempt them from complying with the other obligations laid down in the GDPR or in special legislation.

DPIAs are particularly important in the case of:

- Systematic and extensive evaluation based on automated processing, including profiling, and on which decisions with legal or similar effects are based
- Processing on a large scale of sensitive data or of personal data relating to criminal convictions and offences
- Systematic monitoring of a publicly accessible area on a large scale
- Positive or negative lists by SAs



What is the content of a DPIA?

St. Julian's School must assess the impact of the envisaged processing operations on the protection of personal data, of the processing and its purposes.

Including, where applicable:

- The legitimate interest pursued by the school
- Assessment of the necessity and proportionality of the processing
- Assessment of the risks to the rights and freedoms of data subjects
- Consider expectations of the individuals
- Evaluate the level of risk, based on likelihood, and impact
- The measures envisaged to address the risks
- Including safeguards, security measures and mechanisms (e.g., pseudonymisation, anonymisation, encryption, local storage, access restriction, limiting retention)
- Compliance with approved codes of conduct shall be taken into account

Suggested Template for DPIAs:

Name of Project / New software / New procedure / New application	General name of the task process giving rise to risk	Specific description of the source and the exact nature of the risk	Potential privacy impact or damage	Level of risk based on the likelihood of occurrence	Alternative solutions and potential side-effects
---	---	--	---	--	---

4.6 International transfers

1- In the context of our activity we may have to transfer personal data to third parties.

2- In case of student transfers such third parties may be located both within and outside the EU. Third parties who are in the EU will only have access to Personal Data where the law allows them to do so.

3- The school will make use of technology as an aid to transform learning activities and to provide all latest innovation in learning tools to its students, therefore the school may use some applications and software's that will allow students to learn from a distance (e-learning), these applications may store personal data provided by the students, parents, staff, service providers. The school will undertake all efforts in regards to safeguarding that personal data under the data protection regulation.



4- Where Personal Data is disclosed to third parties located in countries outside the EU which do not ensure an adequate level of protection for Personal Data, the disclosure of such Personal Data will rely only on the protection of the vital interests of students, parents, staff, service providers, volunteers, candidates and interns or explicit consent as set out in Article 49(1)(f) and Article 49(1)(a) GDPR respectively, and following the recommendations of the European Data Protection Board (EDPB). The school will also adopt additional safeguard measures when such data transfers occur, such as pseudonymisation and anonymization whenever these solutions are possible to be applied and don't create obstacles to the learning process of the data subjects.

4.7 Data transfers to subcontractors

Where the processing of personal data is to be carried out by a subcontractor on behalf of the St Julian's School, only subcontractors offering sufficient assurances regarding the implementation of the appropriate technical and organizational measures to ensure compliance with the GDPR and guarantee the accurate protection of personal data, will be used.

The use of subcontractors processing personal data will only take place through the existence of a contract which should include the following:

- a) The object and duration of treatment;
- b) The nature and purpose of processing;
- c) The categories of personal data concerned;
- d) The categories of data subjects concerned;
- e) The obligations and rights of the Company;
- f) The obligations of the processor;
- g) The subcontractor's duty of secrecy;
- h) The safety measures necessary for the treatment;
- i) The conditions under which the data should be returned or destroyed in case of resolution of the contract.

The subcontractor may only resort to another supplier with the specific and prior consent from St Julian's School.

5. Processing data of data Subjects

Schools play a key role in the development and progress of society. They are entrusted with a teaching and guiding role for students, which demands the processing of their personal data together with those in charge of their education such as parents, guardians or teachers. Personal data is being processed since the moment of the application, into the registration phase,



the management of academic transcripts, up to the catering services, transport, etc. inherent in the normal functioning of a teaching establishment such as St. Julian's School; as well as for the start-up and development of extracurricular activities.

The GDPR identifies children as vulnerable natural persons, deserving specific protection, when processing their personal data.

St. Julian's School, in its task of making effective the fundamental right to education that constitutes their *raison d'être*, must also observe the fundamental right of the protection of personal data, which by not being its main activity, sometimes gives rise to doubts as to the interpretation and application of its rules.

There are key moments in order to ensure we are complying with GDPR when processing children's personal data. These moments can be addressed through questions that we should always keep in mind to avoid doubts. First of all, we should question *Why do we need this data?* in order to identify the purpose for processing. Secondly, we should ponder if *"Is it strictly necessary for the fulfillment of our educational functions?"*.

In order to comply with GDPR and answer these questions properly, we must guide the reasoning by the principles of minimization (*collect as few personal data as possible*) and proportionality (*loss of privacy or risk to the data subject must be clearly exceeded by the identified purpose or its result*). Only in this way will we be able to achieve the necessary consideration to advance to the next step.

If we answer the second question affirmatively, we must comply with the obligation to inform the data subject (please see *RIGHT TO BE INFORMED* in the section above) when personal data is collected. If we respond negatively to the question, the legal basis for lawful processing should be consent.

At this stage, we will only have to decide who can legally give consent or should be informed.

Until the child turns 18 (eighteen) years old, the consent must be obtained and the right to be informed must be delivered to the legal guardian of the child. For new personal data collected after the child turns 18 (eighteen) years old, consent must be collected directly from the child.

Please consider section **5.2 Consent** of this document for further considerations.

5.1 Lawful basis for processing personal data

For processing to be lawful under the GDPR, schools need to identify (and document) their lawful basis for the processing. There are six lawful bases listed in Article 6 GDPR:

5.1 (a) – Consent of the data subject



5.1 (b) – Processing is necessary for the performance of a **contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

5.1 (c) – Processing is necessary for compliance with a **legal obligation**

5.1 (d) – Processing is necessary to protect the **vital interests** of a data subject or another person

5.1 (e) – Processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of **official authority** vested in the controller

5.1 (f) – Processing is necessary for the purposes of **legitimate interests** pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

In the absence of a lawful basis to process personal data, that personal data must not be processed.

Data must be collected lawfully, fairly and transparently. It must be collected for specified, explicit and legitimate purposes and mustn't be further processed in a manner that is incompatible with those purposes.

It needs to be adequate, relevant and limited to what is necessary when confronted with the purposes for which they are processed.

It must be accurate, and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, bearing in mind the processing purposes, are erased or rectified without delay.

Personal data must be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using inappropriate technical or organizational measures as per article 32 of the GDPR, and the SJS Management Policies and Procedures relating to IT services.

5.2 Consent

Consent must be freely given, specific, informed and unambiguous. Requests for consent should be separate from other terms and be in clear and plain language.

Consent given for the processing of personal data must be as easy to withdraw as it was to give. Consent must be "explicit" for all data, and St. Julian's School is required to be capable of demonstrating that consent was given.

Consent requires some form of clear affirmative action. Silence or pre-ticked boxes will no longer be sufficient to constitute consent.

The GDPR allows data subjects to withdraw their consent at any time unless there's a posterior legal basis that obliges St. Julian's School to preserve their information.

St. Julian's School must keep a record on how and when the consent was given for each specific purpose. In this sense, all physical forms with consent



collection or online options selected by the data subject must be kept as well as all the further alterations.

A more detailed information about consent for each type of data subject and data processing will be given ahead

5.3 Human Resources Candidates data

5.3.1. Collection

In the context of recruitment procedures established between candidates and the Schools personal data is provided and collected.

The data is collected during recruitment at the following locations:

- Delivered directly by the applicant;
- Collected on the website;
- Received by mail; or
- Received through specific recruitment companies or platforms.

The data received are, in particular, the contents of the curriculum vitae, name, age, date of birth, telephone, mobile phone, address, email, marital status, academic qualifications, professional experience, certificates of Qualifications, including information regarding the criminal record for selected candidates.

St Julian's School may, in the context of compliance with its regulatory and/or legal obligations, carry out background checks gathering information about candidates with other entities.

Background checks can include general information, such as validation that the candidate did perform such functions at the previous entities we are contacting for reference, verify, in general, the previous employer's opinion on the professional abilities of the candidate.

5.3.2. Information

St Julian's School ensures that, in the collection of personal data directly from the candidates, it provides the following information:

- a) The identification of St Julian's School as a controller and, where appropriate, its representative;
- b) What are the purposes of the processing for which the data is intended;
- c) The basis of the processing in the case of hiring;
- d) The categories of personal data subject to processing;
- e) The mandatory or optional nature of the requested data;
- f) The possible consequences of not supplying the data;



- g) How to exercise data subject rights
- h) The retention period;
- i) The right to submit a complaint to the National Data Protection Commission.

Personal information provided within the recruitment context may be processed for other recruitment processes other than the specific one under which it was collected unless the candidate expressly informs St Julian's School that they intend to limit the processing of that data Only for the purposes of that specific application.

5.3.3. Processing purposes

Applicants' data will always be collected in accordance with applicable law and in accordance with best practices, and are intended for:

- a) Recruitment and selection of candidates; And
- b) Communications relating to training initiatives or traineeships.

If St Julian's School intends to process the data of the candidates for other purposes, it shall always provide, for each purpose, the information referred to in this chapter.

Applicants will always be assured of the possibility of exercising their rights, in particular that of being opposed to the processing of their personal data for purposes that are contrary to their wishes.

5.3.4. Legal Basis

St Julian's School ensures that the processing of candidates' personal data is carried out in such a way as to guarantee their lawfulness.

The fundamentals that allow St Julian's School to perform the processing are based on:

- a) The need for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- b) Consent for the processing of personal data for one or more specific purposes;
- c) The fulfillment of legal obligations and defense of the interests to which St Julian's is subject, in case additional information is requested, including personal data of a criminal nature.

5.3.5. Data communication

In the context of the processing of candidates' data, St Julian's School may communicate data to recruitment and selection companies, who act as subcontractors of St Julian's School in the application process.



5.3.6. Consent

Where necessary for the processing operations of the candidates' personal data, in particular beyond the legal obligations of the school or the fulfillment of a contract (5.3.4; a and c), obtaining prior consent from the candidates is mandatory, that consent shall be obtained through written document, in the following terms:

- a)** Information on the treatment that requires the applicant's consent must be presented in an accessible manner;
- b)** The text will clearly identify the different processing purposes for which consent is being sought;
- c)** The language used will be clear and straightforward, so that the consent provided by the applicant can be described as free, specific, informed and explicit consent.

St Julian's School stores the date, method and content of the information provided as well as the validity, scope and willingness of the given consent.

St Julian's School provides a simple method for the subject to be able to withdraw his/her consent at any time.

5.4 Human Resources Employees

5.4.1. Collection

In the context of the contractual relationship established between staff and St Julian's School, personal data are provided and collected.

The data is collected at various times:

- a)** During recruitment, when the potential contributor presents data that identifies it and is already identified in point 5.1. of this policy.
- b)** At the time preceding the conclusion of the contract between the parties, at which time the contributor provides a set of data that are necessary for the conclusion thereof. This data is the information that is collected for writing up the employment contract and its execution, as well as for compliance with legal obligations with regulatory authorities, namely, tax identification number, social Security number or Equivalent, IBAN, bank, number of dependents, social benefits and other equivalents.
- c)** During the execution of the contract, at which time, a set of data may be requested for the management of the contractual relationship. This data is based on information that may be collected for compliance with regulatory and/or legal obligations and of the internal regulations, in particular, data relating to medicine and health at work and data derived from controls on the use of Equipment and information systems.



- d) Employee photograph for school access card, presentation panel, Yearbook and salary processing program.

When the data originates from other sources, St Julian's School will provide the contributor with the information provided below, at the time of registration of the data in its databases or when the data was first made available to the third parties, and never within a period exceeding one (1) month after its collection.

5.4.2. Information

St Julian's School ensures that, in the collection of personal data made directly with the staff, it provides the following information:

- a) The identification of St Julian's School as a controller and, where appropriate, its representative;
- b) What are the purposes of the processing for which the data is intended;
- c) The basis for processing, namely the legitimate interest of St Julian's School, if applicable;
- d) The categories of personal data subject to Processing;
- e) The recipients or categories of recipients of the data, in particular the legitimate interest thereof, if applicable;
- f) The existence of transfers of data outside the European Union and existing safeguards;
- g) The mandatory or optional nature of the provision of the data;
- h) The possible consequences of not supplying the data;
- i) The forms of exercising the rights of data subjects;
- j) The conservation period;
- k) The right to submit a complaint to the National Data Protection Commission (supervisory Authority).

When the data is not collected directly from the staff, the information referred to above adds the indication from which source the personal data originate, and if applicable, whether it came from publicly accessible sources;

5.4.3. Processing purposes

Employee data will always be collected in accordance with applicable law and in accordance with best practices, and are intended for:

- a) Execution of the contract between the parties and the fulfilment of the obligations of St Julian's School;
- b) Calculation and payment of remuneration, ancillary benefits, other allowances and gratuities;



- c) Payment of expenses;
- d) Calculation, operations relating to discounts on remuneration, mandatory or optional, arising from legal obligations;
- e) Attendance control;
- f) Performance evaluation;
- g) Fixing working schedules and work rotations;
- h) Occupational medicine, safety, hygiene and health at work; And
- i) Insurance Management.

If St Julian's School intends to treat the data of the employees for other purposes, the set of information referred to in this chapter, shall always be provided in respect of each purpose. Employees will always be assured of the possibility of exercising their rights, particularly in opposition to the processing of their personal data for purposes that they do not agree with.

5.4.4. Legal Basis

St Julian's School ensures that the processing of personal data of employees is carried out in order to guarantee their lawfulness.

The fundamentals that allow St Julian's School to perform the treatments are based on:

- a) Consent for the processing of personal data for one or more specific purposes;
- b) The need for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) Processing is necessary for compliance with a legal obligation to which St Julian's School is subject ;
- d) When the treatment is necessary for the pursuit of the legitimate interests of St Julian's School.

5.4.5. Data communication

In the context of the processing of employees ' data, StJulian's School may communicate data to the following entities:

- a) IGFSS – Institute for Financial Management of Social security;
- b) AT – tax authority;
- c) Credit institutions and financial corporations;
- d) INE – National Institute of Statistics;
- e) ACT – Authority for work conditions;



- f) IMT – Institute for Mobility and Transport;
- g) Entity that is responsible for the exercise of the functions related to safety, hygiene and medicine at work;
- h) Regulatory and supervisory bodies;
- i) Any other entity to which wage processing and/or other functions related to personnel management have been assigned.

Other entities not mentioned, but which have legal legitimacy to carry out the processing of the data in question, are not excluded.

5.4.6. Consent

When, in particular, beyond the need to comply with legal requirements or the fulfillment of a contract, it is necessary to obtain prior consent from the staff for the processing of their personal data, that consent shall be obtained through specific terms within the employment contract, or through a written document, in the following terms:

- a) Information on the Processing that requires the employee's consent should be presented in an accessible manner;
- b) The text will clearly identify the different processing purposes for which consent is being sought;
- c) The language used will be clear and straightforward;

So that the consent provided by the collaborator is a free, specific, informed and explicit consent.

St Julian's School stores the date, method and content of the information provided as well as the validity, scope and indication of the given consent.

St Julian's School provides a simple method for the subject to be able to withdraw his/her consent at all times.

5.5 - Student 's personal data

5.5.1. Data collection

In the context of the contractual relationship established between students, represented by their parents or guardians and St Julian's School, personal data are provided and collected for the provision of educational services.

Data are collected during enrollment at the school and along the school attendance period. The information is requested for the management of the contractual relationship, compliance with legal and regulatory requirements, and for communication purposes, collected through the respective forms, namely, name, sex, age, place and date of birth, nationality, telephone, mobile phone, address, email, identification documents, tax identification number, photograph.



5.5.2. Information

St Julian's School ensures that, in the collection of personal data directly from the parents or guardians of the students, it will inform through its collection document, or on the website in which the data were collected, the following:

- a)** The identification of St Julian's School as a controller and, where appropriate, its representative;
- b)** Data protection officer and their contacts;
- c)** What are the purposes of the processing;
- d)** The basis for processing, namely the legitimate interest of St Julian's School if applicable;
- e)** The categories of personal data subject to Processing;
- f)** The addressees or categories of recipients of the data, in particular the legitimate interest thereof, if applicable;
- g)** The existence of transfers of data outside the European Union and existing safeguards;
- h)** The mandatory or optional nature of the provision of the data;
- i)** The possible consequences of not supplying the data;
- j)** The forms of exercising the rights of the data subject;
- k)** The conservation period;
- l)** The right to submit a complaint to the National Data Protection Commission.

5.5.3. Processing purposes

Student data will always be collected in accordance with applicable law and in accordance with best practices and are intended for:

- a)** Provision of educational services;
- b)** Management and processing of the student's school path;
- c)** Contact list;
- d)** Student Council;
- e)** Library management;
- f)** Organization of travel, school transportation and excursions;
- g)** Enrolment in extracurricular activities;
- h)** Lost and found management;
- i)** Management of lockers;



- j) School insurance and personal accident insurance;
- k) Sending newsletters;
- l) Recording and use of image and voice.

Other purposes not identified in the preceding paragraphs shall be the subject to specific information and if applicable, consent, at a time which may not coincide with registration., Examples of such situations are, in particular, processing related to psychology, prescribing of medication or health care delivery.

Students represented by parents or guardians are always guaranteed the possibility of exercising their rights, particularly in opposition to the processing of their personal data for purposes that are not appropriate to the consent provided.

5.5.4. Legal Basis

St Julian's School ensures that the processing of the personal data of the students is carried out in order to guarantee their lawfulness.

The fundamentals that allow St Julian's School to process data are based on:

- a) Consent for the processing of personal data for one or more specific purposes;
- b) The need for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) Where processing is necessary for compliance with a legal obligation to which St Julian's School is subject;
- d) When the Processing is necessary for the pursuit of the legitimate interests of St Julian's School.

5.5.5. Data communication

In the context of data processing, the St Julian's School may communicate the student data to the following entities:

- a) Legal, judicial or administrative authorities, in cases where such a transfer is mandatory;
- b) Insurers
- c) Sports centres;
- d) Medical clinics;
- e) Travel agencies;
- f) After School Activities Organizers
- g) Examination Boards



- h) eLearning Platforms under the educational service provision
- i) Others that may be necessary under the contractual relationship established with the data subject and previously communicated to them.

5.5.6. Consent

Where, in particular, beyond the need to comply with legal requirements or the fulfillment of a contract, it is necessary to obtain prior consent from the students/guardians, that consent shall be obtained by written document, or through the website, in the following terms:

- a) Information on the processing that requires the consent of parents/guardians should be presented in an accessible manner;
- b) The text will present the different purposes for which the data are intended individually and clearly distinguished from each other;
- c) The language used will be clear and straightforward in such a way that the consent provided by the student/guardians is free, specific, informed and explicit.

In the case of the use of personal data for the purposes of marketing specific request for consent will be sought.

St Julian's School stores the date, method and content of the information provided as well as the validity, scope and indication of the given consent.

St Julian's School provides a simple method for the data subject to be able to withdraw her/his consent at all times.

5.6 - Personal data of parents/guardians

5.6.1. Data collection

In the context of the contractual relationship established between students, represented by their parents or guardians, and St Julian's School, personal data from parents/guardians for contractual management are provided and collected.

Data are collected during enrollment at the school and along the student's school attendance period. The information that is requested for the management of the contractual relationship, compliments of legal and regulatory requirements, and for the purposes of communication and promotion of the services and products of the school, collected through the respective forms, is framed in this data Namely, name, gender, age, place and date of birth, nationality, telephone, phone, address, email, marital status, identification documents and tax identification number.



5.6.2. Information

The St Julian's School ensures that, in the collection of the data, it will inform through its collection document, or on the website in which the data were collected, of the following information

- a)** The identification of St Julian's School as a controller and, where appropriate, its representative;
- b)** Data protection officer and their contacts;
- c)** What are the purposes of the processing;
- d)** The basis for processing, namely the legitimate interest of St Julian's School if applicable;
- e)** The categories of personal data subject to Processing;
- f)** The addressees or categories of recipients of the data, in particular the legitimate interest thereof, if applicable;
- g)** The existence of transfers of data outside the European Union and existing safeguards;
- h)** The mandatory or optional nature of the provision of the data;
- i)** The possible consequences of not supplying the data;
- j)** The forms of exercising the rights of the data subject;
- k)** The conservation period; And
- l)** The right to submit a complaint to the National Data Protection Commission.

5.6.3. Processing purposes

Parent/guardian data will always be collected in accordance with applicable law and in accordance with best practices and are intended to:

- a)** Contractual management
- b)** Payment of tuition and invoicing
- c)** Contact Schedule
- d)** Parents Association
- e)** Sending newsletters and promotional information

Other purposes not identified in the preceding paragraphs shall be subject to specific information and if applicable, the consent at the time may not coincide with the registration

Parents or guardians have always ensured the possibility of exercising their rights, in particular as opposed to the processing of their personal data for purposes that are not appropriate to the consent provided.



5.6.4. Legal Basis

St Julian's School ensures that the processing of the personal data of the parent/guardian is carried out in order to guarantee its lawfulness.

The fundamentals that allow the St Julian's School to perform the Processing are based on:

- a)** Consent for the processing of personal data for one or more specific purposes;
- b)** The need for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c)** Where processing is necessary for compliance with a legal obligation to which St Julian's School is subject;
- d)** When the Processing is necessary for the pursuit of the legitimate interests of St Julian's School.

5.6.5. Data communication

In the context of data processing, St Julian's School may communicate the parent/Guardian data to the following:

- a)** Legal, judicial or administrative authorities, in cases where such a transfer is mandatory;
- b)** Insurers
- c)** Sports centres;
- d)** Medical clinics; And
- e)** Travel agencies;
- f)** Other entities provided that this has been previously communicated to the data subject.

5.6.6. Consent

Where, in particular, beyond the need to comply with legal requirements or the fulfillment of a contract, it is necessary to obtain prior consent from parents and guardians, that consent shall be obtained through written document, or through the parents platform website, in the following terms:

- a)** Information on the processing that requires the consent of parents/guardians should be presented in an accessible manner;
- b)** The text will present the different purposes for which the data are intended individually and clearly distinguished from each other;



- c) The language used will be clear and straightforward in such a way that the consent provided by the student/guardians is free, specific, informed and explicit.

In the case of the use of personal data for the purposes of marketing, specific requests for consent will be sought.

St Julian's School stores the date, method and content of the information provided as well as the validity, scope and willingness of the given consent.

The St Julian's School provides a simple method for the data subject to be able to withdraw his/her consent at all times.

5.6.7. Data from students and guardians and Internet

When the personal data of the students/guardians are collected via the Internet, the owner of the personal data is informed of the way in which their data are processed through the website privacy Policy and the cookie policy, which are available on the St Julian's School sites. These policies are easily identifiable and contain clear and accessible language.

In the case of the use of personal data for the purpose of advertising specific consent is sought to this effect, through an opt-in window, and is guaranteed to the data subject who may, at any time, oppose such Processing through the privacy policy that is published on the St Julian's School website.

5.7 - Personal data of former students (ALUMNI)

5.7.1. Data collection

St Julian's School stores personal data of Ex-students such as: Name, address, e-mail address, profession.

5.7.2. Information

St Julian's School ensures that, whenever this does not imply an unreasonable effort, it shall give the alumni the information it is obliged to provide under article 13 of the GDPR.

5.7.3. Processing purposes

The Ex-student data is intended for:

- a) Contact purposes; And
- b) Sending newsletters and information about school life;
- c) Historical archiving purposes.



Other purposes not identified in the preceding paragraphs shall be subject to specific information and, if applicable, consent is collected.

The Ex-Students are always guaranteed the possibility of exercising their rights, in particular, against the processing of their personal data for purposes that are not appropriate to the consent provided.

5.7.4. Legal Basis

St Julian's School ensures that the processing of the personal data of the Ex-students is carried out in order to guarantee their lawfulness.

The legal basis that allows St Julian's School to process the data are based on:

- a)** Consent for the processing of personal data for one or more specific purposes;
- b)** In pursuing the legitimate interests of St Julian's School.

5.7.5. Data communication

In the context of the processing of data, St Julian's School may communicate the data of Ex-students to the following entities:

(a) legal, judicial or administrative authorities, in cases where such a transfer is mandatory.

5.7.6. Consent

Where it is necessary to obtain prior consent from the Ex-students, that consent shall be obtained by written document, or through the website, in the following terms:

- a)** Information on the processing that requires the consent of alumni should be presented in an accessible manner;
- b)** The text will present the different purposes for which the data are intended individually and clearly distinguished from each other;
- c)** The language used will be clear and straightforward in such a way that the consent provided by the alumni is free, specific, informed and explicit.

St Julian's School stores the date, method and content of the information provided as well as the validity, scope and willingness of the given consent.

St Julian's School provides a simple method for the data subject to be able to withdraw his/her consent at all times.



5.8 What about Data Subjects under the age of 18?

Naturally, given that we are a school, this means that we process large amounts of personal data that belongs to data subjects under the age of 18. The legal basis for most of this processing is the service that we render. We are a school and therefore we need to process the data of children in order to educate them.

There are, however, certain situations where we need consent in order to process data. For example, the publication of images or video requires consent as they are not essential for the rendering of the schooling services we provide. i.e. we can still educate someone even if we do not publish their images. In those and similar situations consent must be obtained from the parents or legal guardians until the child turns 18.

As regards the processing of data by online services that the school has procured and made available to the students, it is our understanding that consent is not required as the legal basis for the processing given that these services are used as an aid to our schooling services. However, in certain cases, the use of these platforms implies the transfer of personal data to outside the EU, and for that we do need consent. In those situations, we will seek the consent of the parents or legal guardians.

But does this mean that St. Julian's School needs to ask for new consent when the student turns 18?

Not really. With regard to the data subject's autonomy to consent to the processing of their personal data, consent by a holder of parental responsibility, or authorized by a holder of parental responsibility for the processing of personal data of children, can be confirmed, modified or withdrawn once the data subject reaches the age of digital consent. In practice, this means that if the child does not take any action, consent given by a holder of parental responsibility or authorized by a holder of parental responsibility for the processing of personal data, given prior to the age of digital consent, will remain a valid ground for processing.

However, after reaching the age of digital consent, the child will have the possibility to withdraw the consent himself, in line with article 7.3 of GDPR. In accordance with the principles of fairness and accountability, St. Julian's School must inform the child about this possibility.

6. Data Breaches

A data breach occurs where the security or integrity of personal data is compromised. This can occur through misappropriation; loss or theft of data or equipment; unauthorized individuals gaining access; a deliberate



attack on systems; equipment failure; human error of malicious acts such as hacking, viruses or deception.

Under the GDPR, data breach notification becomes mandatory where it is likely to “result in a risk for the rights and freedoms of individuals”.

St. Julian's School needs to document any facts relating to a data breach event.

In this sense, St. Julian's School developed a Guide on Data Breach Management and Procedures that must be followed when the situation occurs.

If any member of St. Julian's School community has information relating to a possible data breach situation should immediately contact the Data Protection Officer.

Without prejudice to the provisions of the security rules of the media and information of the St. Julian's School, in the event of personal data breach, the National Data Protection Commission shall be notified within 72 hours.

The occurrence shall likewise be communicated to the data subjects without undue delay if they respect sensitive data.

The notification to the National Data Protection Commission shall include:

- a)** Description of the nature of personal data breach, including the categories and number of data subjects affected, as well as the categories and number of data records concerned;
- b)** Information on the identity and contacts of the data protection officer or other contact point where additional information can be obtained;
- c)** Description of the consequences of personal data breach; And
- d)** Description of the measures proposed or adopted to resolve the breach of personal data, and, if possible, reduce its effects.

The communication to the data subjects shall contain the information provided for in points (b) c) and (d) of the preceding subparagraph.

Personal data breaches are documented, including the facts relating thereto, their effects and the remedial measures taken.

7. Roles and Responsibilities

Everyone within St. Julian's School has a role to play in ensuring that the School can evidence compliance with data protection laws. The main parties responsible for the enforcement of this policy are the acting Head of the School and the Director of Operations and Finance, supported by the schools DPO in an advisory role and the existing GDPR Governance Team (WLT).



St. Julian's School took the opportunity and reviewed staff practices and personal data forms and the way they were collected. Everyone at St. Julian's School should consider and ask for training on privacy matters, especially on roles or departments with regular contact with personal data collection activities.

All members of St. Julian's School community shall only use the latest and approved version of templates and forms in which personal data is collected.

St. Julian's School staff shall consider all the internal policies and procedures in order to ensure a high level and appropriate compliance regarding privacy and personal data protection.

Below you can find the ways each person within the School community can help.

Board of Management

- Appointing and supporting Data Protection Officer
- Discuss data privacy related issues in the Board of Management meetings.

GDPR Governance Team

- Review the implementation, effectiveness, and compliance with policies, procedures, protocols.
- Key role in driving data protection awareness and compliance
- Developing policies, procedures, and protocols.
- Promoting privacy and data protection awareness sessions
- Identifying training needs
- Taking preventative actions to mitigate the risk of data breaches arising.
- Coordinate with DPO and IT the data breach protocol and procedures
- Due diligence of service providers (data processors) prior to any decision
- Ensuring appropriate written contracts with all service providers (DPAs)
- Consider the Data Protection Impact Assessments' results in the decision-making
- Overseeing data subject right requests
- Working closely with the DPO and IT



Teaching Staff / Caretakers / Security

- Security of school buildings: locking gates, locking doors, locking cabinets
- Ensure alarms are switched on (and working!)
- Ensure that CCTV systems are working and are maintained appropriately.
- Ensure that only authorized persons have access to School buildings.
- Storage of confidential wastepaper until it is securely shredded
- Report any personal data breaches immediately to the DPO and Director of Finance and Operations.
- Comply with and give assistance during audits, due diligences and inspections
- Ensure professional documents are stored under advanced security safeguards
- Ensure confidentiality about health-related information regarding students
- Comply with email usage policy
- Be aware of the risks regarding social networks publications
- Respect access-permission levels

Clerical staff / Receptionist / School Secretary

- Keep the reception area clean and tidy
- Ensure that personal data is not visible to others (eg. leaving files on desk).
- Keep personal data documents out of sight
- Ensure computer screens are not visible to visitors or strangers
- Diligence and attention-to-detail when entering personal data to School systems
- Keep the data accurate, complete, and up-to-date.
- Identify data subject requests when they are received (by letter, email etc)
- If a request is received by telephone, ask the person to put their request in writing
- Ensure that all requests shall be immediately communicated to the DPO
- Be cautious about requests for information: where a request for personal data is received, ask the requester information to verify their



identity, ascertaining whether the requester is legally entitled to obtain the personal data

- Be suspicious: alert to possibility of impersonation, trickery, deception, phishing, social engineering, etc.
- Prepare post with high levels of diligence and attention to detail. Ensuring that the correct letter is put in the correct envelope. Developing post protocol checklist (eg. double-checking enclosures, envelope counts, etc).
- Prepare emails with high levels of diligence and attention to detail:
- Ensure that the correct email address is entered.
- Use "bcc" instead of "to" or "cc" field where appropriate
- Encrypt emails where appropriate.
- If the email is sent to a group, verify who the members of the group are.
- Be cautious and suspicious if an email asks you to click on links or open an attached document (even if from a familiar sender from a genuine email address)
- Immediately report to IT any suspicious email received.
- Respect access-permission levels

IT

- Keep anti-virus and anti-malware software up to date, install patches when required.
- Ensure that data are kept safe and secure
- Use strong passwords (12 characters, mixture of alphanumeric, upper and lower-case, and symbols) and change them regularly
- Never share log-in credentials. Never allow someone else to see you entering passwords (particularly students)
- Immediately notify the Director of Finance and Operations and/or DPO if anyone attempts to obtain unauthorized access to personal data
- Ensure quick response on reported suspicious activity
- Grant access to school platforms and systems to each user according to the defined criterium
- Handle regular audits to school system security
- Supervise user's compliance with equipment's usage policies
- Work closely with DPO and Director of Finance and Operations



School nurse / Medical doctor

- Adhere to ethical standards required by their professional bodies regarding confidentiality and record keeping
- Have a clear understanding of when and in what circumstances data should be shared (eg. child protection, child welfare, medical needs)

- Take responsibility for keeping sensitive data-sets safe and secure
- Ensure compliance with the specific guidelines regarding the processing of health related data
- Ensure consent is given when applicable
- Ensure additional security measures on files kept on personal devices or agendas

8. Special concerns on photographs/videos, apps and social media publications

a) Use of apps in the educational environment

Devices and apps touch nearly every aspect of the data held by St. Julian's School.

Important procedures to bear in mind:

- Protect the LAN with antivirus, firewall, and physical protection.
- Educate students and staff on best practice for home computers.
- Create clear terms and conditions.

b) Use of cloud storage systems in the educational environment

Important procedures to bear in mind:

- Audit data that websites collect automatically (cookies).
- List first and third-party cookies.
- Check online forms for end-to-end security.
- Check consent processes for GDPR compliance.
- Create a privacy declaration documenting:
 - What information is being collected
 - Who is collecting it
 - How it is being collected
 - Why is it being collected



- How it will be used
- Who it will be shared with
- If the intended use is likely to cause individuals to object or complain
- Use strong passwords (12 characters, mixture of alphanumeric, upper- and lower-case, and symbols) and change them regularly.
- Patch web vulnerabilities.

c) Photographs and videos taken inside School premises

Children enjoy specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned as well as their rights in relation to the processing of personal data. Such specific protection should, in particular, apply to the use of personal data of children for the purposes of marketing.

If images are taken from the school with an educational purpose (e.g. work carried out for the school), school is not authorized for the processing without the specific consent.

Images or audio recordings captured for strictly pedagogical purposes do not require consent as a basis for processing and rather fall into the scope of the school's legitimate interest. Nevertheless, such captures are not to be made publicly available. If they are used for other purposes other than the pedagogical, then explicit consent must be obtained.

If taking images does not correspond to the educational activity of the school (e.g. images of events that are taken mostly with the purpose of publishing them on the school magazine or on the school website), consent of the data subjects will be mandatory, and school will inform previously about the purpose of the pictures and, especially, about the existence of the possibility that the picture will be accessible indiscriminately or, on the contrary, will be limited to the school community.

When possible, it is recommended to publish these contents in a private area of St. Julians's School website or platforms where it is necessary to access through identification and password.

School is not obliged to get consent for every photo and is not obliged to renew that consent every time.

C.1. Rules for using photos and videos

Photos, Videos or Audio Recordings of School Events and everyday life that are not for pedagogical purposes

Students



St Julian's School is aware that for most situations consent is required before photos or videos are published.

For some publication platforms such as the Alumni, Parents and Summer School Portals a dedicated consent request mechanism has been set in place which allows users to inform the school of their wishes as regards publications of images or videos on these platforms

For all other publication mediums, the school has defined two broad categories of image medium publication: external or internal. The different channels the school may use, and their category, are identified in the Student Image Consent Form and on the Publication Medium Table present in the St Julian's Image Capture Procedure document. In order to assess the consent status of students as regards these 2 broad categories the school issues a yearly request for consent sent to parents or guardians. This consent may be withdrawn or changed at any time and any changes will only apply to future publications.

At times and for specific events parents may wish to alter the consent status of students. For this purpose, the school provides an ad-hoc consent status form which establishes the consent status of particular students as regards a specific event and medium(s) of publication.

In the case of group photos or videos the school may engage in selective blurring so as to make identification of specific students impossible if they have not expressed consent for that specific publication.

School events may be broadcast in live stream. This live stream will be active for a limited period of time and access will be granted by password. Consent will be requested through the annual image consent form

Staff

Staff members are also invited to express their consent status as regards publication of photos, videos or audio recordings and the school provides means for this to be expressed.

The one exception to this are the Official Class Photographs where the legal basis for their processing (publication) can be found in the need for the performance of a contract to which the data subject is party in accordance with Article 6, 1 (b) of the GDPR. This information is provided to staff in accordance with Article 13 of the GDPR.

Data subjects external to the school

Sometimes it may happen that persons, not belonging to the school, may appear in captures the school may wish to publish. In such cases the school will endeavor to obtain the required consent before publication. If such consent is not obtainable then blurring of such persons may occur.

Photos, videos or audio recordings for pedagogical purposes

The School understands that sometimes images, videos or audio recordings may be captured for pedagogical purposes. In such cases the basis for processing is the school's legitimate interest as an educational



establishment in accordance with Article 6 1(f) of the GDPR. In such situations explicit consent might not be sought.

Nevertheless, these will typically only be used internally. If at any point there is an intention to use these outside the internal school community then an explicit consent, for that purpose, will be sought.

C.1.1. Communication on school events on the website and social networks: general guidelines

School events will be reported on the website and social networks. In these publications, only group photos should be used whenever possible. In social networks, only group photos will be used, and generic images should be opted for when this is not possible (logos, buildings, landscapes, etc.). In cases where the groups participating in the activity are small, thereby making persons more easily identifiable the consent expressed when signing the school's image consent form is considered valid and sufficient.

In the case of school events involving the participation of reduced groups of students, who have been selected to participate in these events, or in the case of school or Inter-school events in which specific students have distinguished themselves, and in which it makes sense to refer to the name of specific students, specific consent must exist / will be requested from their guardians for the publication of the name and/or photograph on the website and/or social networks of the school (it being possible to authorize one and not the other, or vice versa) . In cases where this has recognized relevance, the school year that the student attends may be published, but never his/her specific form.

C.1.2 Generic School Publications

In the case of brochures and other promotional materials, the use of very explicit plans of the students should be avoided. Specific authorizations will be requested from minors and older pupils whose photographs are identifiable.

In the case of promotional videos, the use of very explicit close ups of the students should be avoided. If this proves to be indispensable, specific consents will be requested from the parents or guardians of students who are identifiable in the video.

In the case of the use of photographs of students on generic pages of the website not related to school events in which they have participated (e.g. "admissions section of the website"), the use of very explicit plans of the students should be avoided. If this proves to be indispensable, specific consents will be requested.

C.2. Photos and videos captured by faculty, staff, guardians and external persons



C.2.1. Photographs taken by the staff of the school in private or with recourse to own means

In general, it is advised not to capture private photographs of school students. In cases where this is necessary or relevant, for example due to the unavailability of the multimedia team at a school event (pedagogical activity, class trip, tour), the photographs must be transmitted to the colleagues responsible for their publication (Marketing, multimedia). Personal storage is permitted, but it is expressly prohibited to share with third parties (including parents and guardians) or on digital platforms or social networks.

C.2.2. Share photos with students or parents/guardians

Staff can share photos with parents/guardians where the students are isolated with their parents/guardians or on their own. They may not, by any means, share with parents/guardians, photographs in which other children are identifiable, without the express permission of their parents/guardians (e.g. via Twitter, Whatsapp and other means).

C.2.3. Photographs taken by external persons

Unless prior consent has been given it is prohibited for persons outside the school community, to photograph or film students and staff.

C.2.4. Photographs taken by parents/guardians to other students

Parents/Guardians are not allowed to photograph or film students other than their own, without prior consent from their parents/guardians.

Regarding image capturing and publishing, the school has defined specific guidelines to be complied with. These guidelines are to be made available to all participating parties.

d) Use of social networks and the website of St. Julian's School

- **Enforce secure communications through HTTPS.**

If the application does not require any form of authentication, then HTTPS might not seem needed. But it is easy to overlook some things. For instance, some applications collect personal information through their "contact us" forms. If this information is sent in clear text, it will be exposed through the Internet. Also, the IT department will make sure that the SSL certificate has been properly deployed and is not exposed to vulnerabilities related to SSL protocols.

- **Inform users about and encrypt personal data from 'contact us' forms.**

Applications do not collect information only through authentication or subscription, but also through contact forms. Most of this information is personal, including email address, phone number, and country of residence. Users must be informed how this data will be stored and for how long. The use of strong encryption is highly recommended for storing this information.

- **Make sure sessions and cookies expire and are destroyed after logout.**



Users must have proper visibility about the use of cookies by the application. They must be informed that the application is using cookies, the application should provide the opportunity for users to accept or deny cookies, and cookies must be properly destroyed after inactivity or logout.

- **Inform users about any data sharing with third parties**
- **Photographs used for marketing purposes**

Specific informed consent for these images and only use them online with the consent provided. Please note that St. Julian's School has updated all the forms in order to collect consent from data subjects that specifies their authorization for online publication of their videos and/or photographs. Person in charge of publishing these contents must ensure that all can be published according to data subjects' preferences.

9. Final Considerations/ Provisions

- a)** Enforcement of policy and non-compliance

After approval, this policy is of prompt application.

Updates to the policy contained in this document shall be valid from the date of their approval.

All employees of the St Julian's School are obliged to know the content of this policy and its subsequent updates.

Collaborators are obliged to comply with this policy and to collaborate in its application. Failure to comply with these rules may lead to disciplinary action. The lack of knowledge of this policy does not justify any kind of non-compliance.

Employees should refrain from any behavior on which they have doubts, and may request the designated DPO team by sending an email to dpo@Stjulians.com for any clarifications.

In the event of a disconformity between the data protection and privacy policy and the legislation, the legislation prevails over the privacy and data protection policy.

- b)** Review and monitoring of the Data Protection Policy

This policy shall be revised periodically or where, by virtue of the needs arising from the activity of the St Julian's School, facts, or legislative changes, so demands it.

- c)** Communication and Disclosure

After approval, this policy will be disclosed to the staff of the school and published on the school's intranet.

- d)** Related policies

- Online Safety Policy
- Information Security Policy