

PRIVACY NOTICE ON PROCESSING PERSONAL DATA OF AISZ'S STUDENTS AND THEIR PARENTS/LEGAL GUARDIANS

1. PURPOSE OF THIS NOTICE

The American International School of Zagreb, Ulica Damira Tomljanovića Gavrana 3, Zagreb, Croatia ("we "or "AISZ ") wishes to be completely transparent regarding the processing of personal data according to the General Data Protection Regulation no. 679/2016 applicable in the European Union ("GDPR") and therefore, we have presented below all the information you may need on this subject matter.

Please read this privacy notice to understand the data processing operations carried out by AISZ.

2. WHO ARE WE?

This Notice refers to the processing of personal data collected and processed by AISZ. We consider ourselves as a data controller, meaning that we decide how and why we shall collect and further process your personal data i.e. we establish the purposes and means of processing the personal data.

3. WHOM DOES THIS NOTICE APPLY TO?

This Notice applies to processing personal data on prospective, current and former students and their parents or legal representatives as part of its everyday operations of providing educational services by AISZ. When we use the term "parent", the term refers to both biological or foster parents, legal guardians and custodians.

4. DEFINITIONS

In accordance with the GDPR, the terms in this Notice have the following meaning:

"personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, 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;

"processing" means any operation or set of operations which is performed on personal data or sets of 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;

"controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

"processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

"recipient" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

"**third party**" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

"**controller**" means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

"**personal data breach**" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, or unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

As most of the students are below the age of 18, consent for students as data subjects are given by their parents. If a student is 18 or older, consent is given by the student. Therefore, whenever in this Notice we refer to parents' consent, reference to parents' consent should be read as reference to the consent given by the student who is 18 or older.

Please note that communication, whether expressly stated or reasonably assumed as a mean of achieving a certain purpose of personal data processing, may include electronic communication tools such as Google Workspace, Gmail, Chat, Google Meet, Google Drive and other appropriate and well-established tools.

5. WHICH CATEGORIES OF PARENTS' AND STUDENTS' PERSONAL DATA DOES AISZ COLLECT AND PROCESS?

AISZ might collect the following categories of parents' personal data:

- Identification information - Name, surname, PIN, licence plate number, photo
- Contact information - Address and e-mail address, phone number, contact information for emergency purposes
- Employment information - Place of work and position
- Financial data - Financial aid information (such as salary information, other data required to fairly evaluate eligibility for financial aid), payment data
- Educational information - Educational and professional background information
- Video recordings: CCTV video recordings that may contain personal data are taken when entering or while on the school premises

AISZ might collect the following categories of students' personal data:

- Identification information - Name, surname, Croatian PIN (OIB), gender, date, place and country of birth, citizenship, residence, other ID document data, copy of passport or ID card
- Contact information - Address, information on external referee or physician
- Information on academic achievements - Information on education, grades, attendance, learning outcomes, test and sports results, special knowledge, skills and competencies, other information provided during the admissions process, other documents (for example, diplomas, certificates and similar) etc.
- Medical data - Psychological/behavioral evaluation, medications used, medical records, allergies, special needs and learning disabilities, vaccination certificate, vaccination booklet or equivalent vaccination records, copy of doctor's certificate that the student is ready for school
- Images and video recordings - Individual and group photos and videos of students, including CCTV video recordings.

6. FOR WHAT PURPOSES DOES AISZ PROCESS PARENTS' AND STUDENTS' PERSONAL DATA?

AISZ processes parents' personal data for the following purposes:

a. Application for admission

AISZ needs to evaluate each application for admission of a student to the school. In connection thereto, AISZ processes parents' identification information (name, surname etc.) and contact information (address and e-mail address etc.).

In such case AISZ processes parents' personal data in school information systems because such processing is necessary for the performance of the enrolment contract or to take steps at the request of the data subject prior to entering into the enrolment contract.

b. Payments and financial aid

AISZ needs to process certain personal data of parents to receive, process, and make payments to and from parents of AISZ students, as well as manage its accounting.

For this purpose, AISZ processes parent's identification information, information on parents' bank account number and other relevant financial information that may be disclosed to AISZ during payments of application fee and tuitions. AISZ also processes employment data if the parents' employer participates in payment of tuition.

Should a parent apply for a financial aid program that AISZ offers, AISZ may process parents' data on personal financial circumstances, PIN, employment information, and educational and professional background information. Such data may be transferred to a web-based service provider from the USA operating a standardized tool, meaning that your personal data may be transferred to the USA.

In such case AISZ processes parents' personal data in the school information systems because such processing is necessary for the performance of the enrolment contract.

c. Databases of all applicants

AISZ organizes its internal operations so that every stage of admission process is conducted properly and in the most optimal way, saving time and energy necessary to handle all applicants in a timely manner. For this purpose, AISZ creates databases which may contain personal data referred to in a. and b. hereto.

In such case AISZ processes parents' personal data because such processing is necessary for the purpose of AISZ's legitimate interest.

d. Concluding and executing enrolment contract

AISZ needs to process the personal data of parents to properly provide educational and other services from the enrolment contract to their children, including for administrative purposes, communication with parents, organizing meetings, sending invoices or keeping records of payments.

AISZ will use parents' personal data to communicate with them before concluding the enrolment contract and during the term of the contractual relationship, and to answer questions and requests from parents.

For this purpose, AISZ predominantly processes identification information and contact information, as well as other categories of parents' personal data. Also, AISZ offers parents a parking reservation for which purpose parents are asked to state their license plate numbers.

In this case, AISZ processes personal data because such processing is necessary for the conclusion and execution of the enrolment contract that AISZ concludes with the parents and for AISZ to take appropriate steps at their request prior to entering into the enrolment contract.

e. Emergency pack

AISZ must notify parents immediately in case of an emergency that concerns their child. For this purpose, AISZ processes parents' contact data as part of the "emergency pack". Emergency pack is a file that contains a list of students and their parents' contact information.

In such case AISZ processes parents' personal data because such processing may be necessary to protect vital interests of students and it is necessary for the purpose of AISZ's legitimate interest.

f. Protection of security and integrity

To control entrance and exit from the school's premises and surroundings, and to decrease the exposure of students, parents, employees, and other visitors to robberies, burglaries, violence, theft, and similar events, AISZ uses video surveillance and identifiable access control cards. These measures are common and necessary for safeguarding.

For these purposes, AISZ processes parents' personal data in the form of video recordings on the premises under video surveillance. AISZ also collects photos and identification information (name and surname) for personal ID cards based on legitimate interest. If parents object, their identification information is left with the reception security instead.

g. Sports Competitions and Newsletters

For the student to take part in sports/athletics competitions in Croatia and abroad, AISZ needs to deliver parents' identification and contact information to the competition organizer to validly submit an application to the competition.

AISZ collects stories and students' experiences and publishes them in newsletters which are sent to parents. For this purpose, AISZ collects and processes the parents' identification and contact information.

For all listed purposes AISZ processes parents' personal data based on their separate consents.

AISZ processes students' personal data for the following purposes:

a. Application for admission

AISZ needs to evaluate each application for admission of a student to the school. In connection thereto, AISZ processes prospective students' identification information (name, surname, PIN, gender, date, place and country of birth, citizenship, residence and other ID document data), contact information (address), information on previous academic achievements (certificates, grades etc.), and information on student's readiness for school obtained by review of doctor's certificate.

In such case AISZ processes students' personal data in school information systems because such processing is necessary for the performance of the enrolment contract or to take steps at the request of the data subject prior to entering into the enrolment contract.

AISZ may also request parents to provide student's vaccination certificate, vaccination booklet or equivalent vaccination records, as well as a copy of doctor's certificate that the student is ready for school. In such case AISZ processes student's vaccination data based on legitimate interest.

AISZ collects and stores students' passport copies and their photographs so that identity checks may be conducted in a convenient manner. AISZ shall undertake this processing only if a parent's/guardian's prior consent has been obtained.

b. Databases of all applicants

AISZ organizes its internal operations so that every stage of the admission process is conducted properly and in the most optimal way, saving time and energy necessary to handle all applicants in a timely manner. For this purpose, AISZ creates databases which contain personal data referred to in a. hereto.

If a student is declined admission to the school, AISZ keeps only identification data of the applicant and the general note on why the student was declined so as to apply special attention to such students if they re-apply to school.

In such case AISZ processes students' personal data because such processing is necessary for the purpose of AISZ's legitimate interest.

c. Emergency pack

AISZ ensures safety of students and personnel. In order to achieve faster organization in case of emergency, AISZ created an "emergency pack" for students. Emergency pack is a file that contains a list of students and their parents' contact information.

AISZ must notify parents immediately in case of an emergency that concerns their child. For this purpose, AISZ processes students' identification and contact data (if applicable) as part of the "emergency pack".

In such case AISZ processes students' identification data in electronic and paper form because such processing may be necessary to protect the vital interests of students and it is necessary for the purpose of AISZ's legitimate interest.

d. Providing education, student registry and administration

To create registries and administer data on student enrolment, class books and work diary used for grading of students and to record their learning outcomes, AISZ processes students' identification data, academic achievements and progress, notes on students' suitability for school programs, attendance and other data potentially revealed to AISZ in the course of providing education services.

Diligent keeping of records and systems organizations is important for daily operations and student activities in AISZ, organizing classes and schedules, scheduling of appointment with parents, etc.

AISZ processes this scope of students' data in the school information systems because such processing is necessary for the performance of the enrolment contract. AISZ may process students' data on various backup tools when necessary for the purpose of AISZ's legitimate interest.

e. Protection of security and integrity

AISZ prioritizes a safe and welcoming learning environment for all students. A multi-layered approach is employed to achieve this goal:

- **Access Control:** All students are issued an access control card with their names and photos. These cards work with our access control systems and must always be carried within the school. This important security measure helps us minimize the risk of unauthorized access, theft and other security incidents.
- **Video Surveillance:** Video cameras are used throughout the school to protect students, staff and the school property.
- **Student Profiles:** Photos are also used in your electronic student profiles. They help everyone within the school community identify each other, promoting secure and easy communication between students, staff, and parents.
- **IT Security:** ICT security measures prevent unauthorized access and cyberattacks and involve processing students' names, surnames, and e-mail addresses for safety purposes.

All processing of your personal data within our security measures is based on our legitimate interest in maintaining a safe learning environment.

f. Safeguarding and medical office services

Depending on each student's needs and requests, dedicated school employees, counsellors, provide support to students' emotional and social development which significantly impacts students' learning outcomes. Also, AISZ medical office provides basic medical support and direction to students.

For this purpose, AISZ processes student's identification information and may process student's contact information and medical data which may be revealed during these support consultations or by completing provided forms.

For such purpose AISZ processes students' identification and contact information because it is necessary for the performance of the enrolment contract.

When these services involve processing of students' medical data, AISZ processes them based on parents' consent.

g. Record of allergies

During enrolment, parents provide information about students' allergies which are stored in school information systems and backup files for the purpose of creating record of allergies.

This way the school catering services are made aware of potential danger foods. Also, correct information is relayed to doctors or other medical staff when administering medications in case of emergency.

For such purpose AISZ processes students' personal data based on their parents' consent.

h. Yearbook, newsletters, web page, social networks, school information systems and other promotional materials

AISZ collects and processes photos of students for the purpose of publishing a yearbook. AISZ collects stories and students' experiences and publishes them in newsletters which are sent to parents and later to school's alumni to stay in touch. Certain photos and videos taken during classes, competitions, or various events and festivities throughout a student's enrolment may also be retained for internal purposes to preserve valuable memories and historical records of school activities.

AISZ updates the web page and social media feed with news and photos for the school's promotional purposes. AISZ also uses digital signage system (screens) in the school and may use digital or physical advertising materials.

When publishing such content, AISZ may publish students' name, surname, grade, and photos or videos. More details on the processing of images and videos can be found in AISZ's Policy of Use of Images and Recordings of Students by the School.

Students are also photographed at the beginning of each school year and the photo is used to create physical and digital ID cards for identification purposes and safeguarding measures.

For most of the purposes above, AISZ processes students' personal data based on their parents' consent. Where applicable, such as for personal ID cards or the internal digital signage system, AISZ may also process this data for safeguarding measures or to promote community and school spirit, based on legitimate interest.

i. Sports Competitions

For the student to take part in sports/athletics competitions in Croatia and abroad, AISZ needs to deliver to the competition organizer the students' identification and contact information, grade and school information, records of allergies and relevant medical conditions, in order to validly submit an application to the competition.

For such purpose AISZ processes students' personal data based on their parents' consents.

j. Learning and development tools

AISZ may offer students to assess their learning development using various external online tools (e.g. NWEA, WJIV) and to help them apply to colleges (e.g. Bridge U). When using these tools, students usually create their profiles which include their personal data such as name, surname, grades, class, test results etc.

For such purpose AISZ processes students' personal data based on their parents' consent.

Even when the students leave our school and become our alumni, AISZ still processes students' personal data for the following purposes:

a. Keeping academic records of AISZ alumni

AISZ processes academic records and documents evidencing academic achievements of its alumni to comply with the legal obligations of AISZ as an educational institution.

For this purpose, AISZ may process the identification data of alumni and their academic records for the periods as set out in the applicable laws concerning educational institutions.

In this case, AISZ processes the personal data of alumni because such processing is necessary to comply with the legal obligations of AISZ.

b. Alumni database for communication with alumni

AISZ keeps alumni database with records of students who graduated/left school to maintain continuity of communication with its alumni, organize events with alumni participation, provide alumni with information on education at AISZ and create potential business relations.

Alumni database also enables that each student may be correctly matched to their results (grades, achievements etc.) if they request their academic data export.

For this purpose, AISZ processes alumni's identification data, contact data, in some cases academic data and other information such as year of enrolment and year of graduation/leaving school.

This processing is necessary for the purpose of AISZ's legitimate interest.

c. Delivering AISZ newsletter

AISZ publishes a newsletter where it collects stories and news on AISZ and information on social events. Newsletter is sent to alumni who agreed to receive it. For this purpose, AISZ processes alumni name, surname and e-mail address. In such case AISZ processes alumni's personal data based on alumni's consent.

d. Preserving memories and historical records

To preserve valuable memories and historical records for the benefit of the alumni, AISZ may choose to retain and process certain photos and videos captured during classes, competitions, events, and festivities throughout a student's enrollment.

Such photos and videos may be used for specific purposes, such as alumni communication, event promotion and collecting historical documentation of the school.

AISZ processes any such photos and videos that may identify a person based on alumni's or their parents' consent.

e. For the protection of persons and property

AISZ processes personal data of alumni collected through video surveillance on AISZ premises and campus to protect control of entry and exit from the premises of AISZ, reduce exposure of persons and property to the risk of robbery, burglary, violence, theft, and similar events.

For this purpose, AISZ processes video recordings of alumni, as well as any other visitors to the school.

In such case AISZ processes alumni's video recordings because this is necessary for the purpose of AISZ's legitimate interest.

7. HOW LONG DOES AISZ KEEP PARENTS AND STUDENTS' PERSONAL DATA?

AISZ keeps the personal data in the period necessary for accomplishment of above mentioned purposes within the deadlines provided by the law or other regulations, and in certain cases as long as it is reasonable and recommendable in the context of the applicable statute of limitation.

Personal data collected during the admission process is deleted if the student is not enrolled. We retain only minimum data necessary for record keeping and internal administration based on our legitimate interest.

If the student is enrolled, personal data is collected and processed for the duration of the enrolment contract. In cases where AISZ processes personal data based on consent, the retention period may be even shorter if the consent is revoked. When the student leaves the school, certain personal data may be retained for an additional 6 years for essential administrative purposes. Extended retention periods may apply when mandated by our legal obligations, justified by our legitimate interests, or approved by alumni through their specific consent.

It is possible that AISZ may be obliged to permanently keep certain personal data of its students, as provided by AISZ's internal acts and applicable regulations.

To keep our school area safe, AISZ retains video surveillance records for 3 weeks, or longer, if required for a legal dispute. Access control records, such as name and surname of persons entering our premises, or the vehicle license plates, are kept during the duration of the school year.

AISZ shall keep personal data accurate and updated, based on information delivered by the parents and students.

Upon expiry of the period necessary or prescribed for processing of personal data, AISZ shall securely delete or destroy personal data.

8. WHO HAS ACCESS TO THE PERSONAL DATA?

Access to students' and parents' personal data can be granted to AISZ's employees who have limited rights to access and process personal data for the purposes of performing their work tasks, especially those employed as teachers, counsellors, employees in charge of invoicing, managers etc.

In this respect, only the counsellors and/or medical office have access to the students' medical data.

Other departments of AISZ have access only to specific health data (i.e. on allergies or medical conditions triggering special learning needs).

Access to alumni's personal data can be granted to AISZ's employees who participate in the business development and who have limited rights to access and process personal data for the purposes of performing their work tasks, especially those employed in marketing and business development.

All employees of AISZ who are authorized to access or otherwise process personal data are required to maintain their confidentiality (as per the employment contract) and act in accordance with privacy notices, policies, procedures, and other general acts and contractual obligations of AISZ.

To the extent in which it is necessary and allowed under regulations, to accomplish purposes for which personal data have been collected and/or processed, AISZ may disclose it to third parties such as:

- a) service providers, which based on special contracts provide to AISZ certain services which may also include processing of parents', students' or alumni personal data, in particular school information systems providers, learning software providers, on-line tools, server hosting providers (e.g. Google),
- b) cafeteria owner in its capacity of independent provider of meal services on campus,
- c) travel agencies, catering, courier and transportation providers,
- d) photographers and video crew,
- e) government and public authorities, court authorities or private legal entities, when AISZ is obliged to deliver personal data based on statutory obligations or when this is necessary in order for AISZ to protect its rights and interests,
- f) business partners, to the extent in which transfer of personal data to such entities or persons (e.g. disclosure of academic performance information) is necessary for performance of rights and obligations arising from enrolment contract with AISZ,
- g) tax, legal and accounting consultants.

In some cases, personal data may be transferred to countries which are not members of the European Union and European Economic Area, including United States of America, which may have different and potentially lower standards of personal data protection than those prescribed in the Republic of Croatia.

In such case AISZ shall undertake appropriate protective measures in order to ensure adequate protection of your personal data. Such measures include conclusion of the agreements in accordance with forms which have been adopted by the European Commission for such purpose (using so-called standard contractual clauses for transfer of personal data abroad).

9. HOW DOES AISZ PROTECT PERSONAL DATA?

To protect personal data, AISZ undertakes appropriate protective measures which are in accordance with applicable regulations on protection of privacy and personal data.

This also includes request towards AISZ's service providers to take appropriate measures to protect the confidentiality and safety of processed personal data.

In its business AISZ has implemented technical, physical and organizational measures for protection of personal data from accidental or illegal destruction, accidental loss, damage, alteration, unauthorized disclosure or access and all other forms of illegal and/or excessive processing.

10. WHAT ARE THE PARENTS' AND STUDENTS' RIGHTS AND HOW CAN THEY BE EXERCISED?

In the context of personal data protection, parents, students and alumni have the following rights:

- h) right to access their personal data, i.e. the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed, right to request access to personal data and information on processing as well as a copy of personal data being processed;
- i) right to rectification of inaccurate personal data and right to have incomplete personal data completed;
- j) right to erasure of personal data, especially if such data are no longer necessary in relation to purposes for which they were collected or otherwise processed, if the personal data have been unlawfully processed, if the personal data have to be erased to comply with a legal obligation or if the consent has been withdrawn;
- k) right to restriction of processing;
- l) right to object to data processing;
- m) right to lodge a complaint with the Croatian Personal Data Protection Agency.

AISZ shall undertake all measures to enable parents and students to exercise the abovementioned rights, however in certain cases the exercise of these rights can be limited or excluded.

11. TO WHOM CAN YOU REFER QUESTIONS ON PERSONAL DATA PROTECTION?

For any information, feel free to contact AISZ or AISZ's data protection officer by sending message to the following e-mail address: dpo@aisz.hr or contacting the phone number +385 1 7999 300.

12. AMENDMENTS TO THE NOTICE AND CONSOLIDATED VERSION

This Notice shall apply as of January 2024 and is subject to occasional amendments.

The last version of this Notice, which shall always be relevant for processing of personal data of students and parents, is available on AISZ's web site.