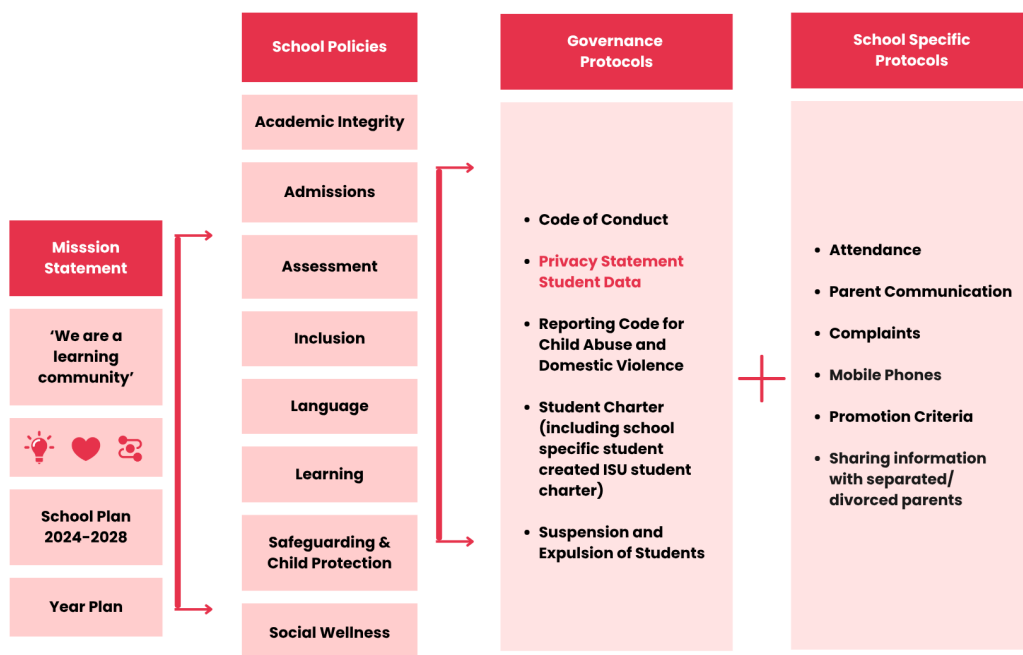


**International
School
Utrecht**

Privacy Statement Student Data

Approved by GMR (Joint Participation Council) NUOVO	23 March 2020
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Contact details NUOVO Schools

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Data Controller (governing body) of the school: the Executive Board.

Contact details Data Protection Officer: privacy@nuovo.eu.

Please note: This document is an unofficial translation of *the Privacyverklaring persoonsgegevens leerlingen NUOVO Scholengroep*. In case of a dispute the Dutch text is leading.

Introduction

NUOVO processes personal data of all its students. NUOVO considers the proper handling of personal data to be of great importance and is mindful of privacy legislation. NUOVO is responsible for the careful handling of your personal data as a student or, if you are reading this as a parent/caregiver, your child's personal data (hereinafter: the student). In this privacy statement, we would like to explain how we handle the student's personal data. For a more comprehensive, more legal explanation of the handling of personal data, we refer to NUOVO's Privacy Regulations.

Why we process the student's personal data

We process the student's personal data in order to fulfil the education agreement we have with the student and/or to comply with our legal obligations.

NUOVO processes the student's personal data in order to fulfil our obligations as an educational institution. For example, we need the personal data to register the student as a student at our school, to monitor academic progress, and to enable the student to obtain a diploma. In addition, we have a legal obligation to forward certain personal data to other parties, such as *DUO* (Ministry of Education, Culture and Science) and *Leerplicht* (Truancy Services).

Personal data that do not meet one of the two grounds mentioned above will only be processed with consent. If consent is requested for the processing of personal data, such as for the use of visual material (photographs and videos), you may withdraw or grant consent at any time. (Changes to consent do not apply to visual material that has already been published).

What personal data we process about the student

We process various types of personal data, some of which we have received directly from parents/caregivers. Examples include contact details and place of birth. If you refuse to provide the personal data necessary for us, we cannot fulfil our obligations. The provision of this personal data is therefore a condition for enrolling the student at NUOVO. We also receive personal data via *Onderwijs Transparant*.

You can find which personal data we process about the student at the bottom of this explanation in the table Categories of Personal Data.

At your own request and with your explicit consent, we may also process medical personal data about the student. This is limited solely to personal data that are necessary to be able to act properly in emergencies. For example, you can inform us that the student has epilepsy, so that we can act adequately in emergency situations. NUOVO will never force you to provide such personal data.

How we handle the student's personal data

When processing personal data, we always work on the basis of necessity; we will not process more personal data than is necessary to fulfil our rights and obligations as an educational institution. This also means that we will not use the personal data for purposes other than those mentioned in this explanation. In a number of cases, as indicated earlier, we are obliged to share the student's personal data with other organisations. These include *DUO*, *Leerplicht* (Truancy Services), *de Onderwijsinspectie* (the Education Inspectorate), *GGD/schoolarts* (the Municipal Health Service/school doctor), *Samenwerkingsverband* (the regional support network for inclusive education) and the controller.

We may request commercial third parties to assist in processing the personal data for the aforementioned purposes. Examples include applications to support students in lessons, an administration system where the personal data are not stored on our own network but with another organisation, or a timetabling programme. This always takes place on behalf of and under the responsibility of NUOVO. We enter into agreements with these organisations, which set out, amongst other things, which personal data are processed and how these personal data are secured.

We will not share the student's personal data with commercial third parties for other purposes. Nor will we ever sell or rent the student's personal data to third parties. We use systems in which personal data are stored in encrypted form as much as possible, and only those members of staff who need access to the personal data for the performance of their work can access them. In addition, we do not keep the personal data for longer than is necessary. We apply various retention periods for this purpose, which are legally regulated and established.

Rights of students and parents/caregivers (of students younger than 16yrs old)

As parents/caregivers, you have a number of rights when it comes to personal data. These rights are set out in law. Students and/or parents/caregivers can exercise these rights at any time. This means, for example, that you can always submit a request for access to the personal data we process about the student.

You can also submit a request to rectify, restrict, or completely erase personal data from NUOVO's systems. You always have the right to supplement or correct incorrect personal data. We will then ensure that these

personal data are also amended at organisations with which we share and/or exchange the student's personal data.

If you ask us to restrict or erase the student's personal data, we will assess whether this is possible. In this assessment, we comply with legal requirements and consider, for example, whether we have a legal obligation to retain the personal data.

You also have the right to request that the personal data we process about the student and which we have received from you be transferred to you or, at your request, to another organisation.

NUOVO will not make decisions about the student that are based solely on automated processing of personal data (profiling). Decisions are never made without human intervention.

If you do not agree with how we handle the student's personal data, you can always request clarification from our Data Protection Officer (see the contact details at the top of this document). If you feel that your problem is not being resolved satisfactorily, you can report this to the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl).

List of categories of personal data

Note: the personal data in the table on the following page are only registered if this is necessary. This means that we do not register medical data or data about religion, for example, if this is not necessary.

Category	Explanation
1. Contact details	1a: surname, first name, email, school, course; 1b: date of birth, gender; 1c: other personal data, such as: address, postcode, place of residence, telephone number and any other personal data required for communication, as well as a bank account number for processing payments;
2. Student number	an administrative number that contains no information other than that referred to under category 1.
3. Nationality and place of birth	
4. Parents/caregivers/legal guardians	contact details of the parents/caregivers/legal guardians of students (surname, first name, address, postcode, place of residence, telephone number and email address if applicable).
5. Medical personal data	personal data that are necessary with regard to the health or well-being of the student, insofar as these are relevant when taking additional measures to enable proper education to be followed (e.g. extra time during tests).
6. Religion	personal data concerning the religion or belief of the student, insofar as these are necessary for the education to be followed.
7. Academic progress	personal data concerning the course the student follows and progress results, such as: • Examination (personal data relating to the examination) • Study pathways • Student support (including development perspective OPP) • Attendance registration • Medical file • Class, year group, course

8. Educational organisation	personal data for the purpose of organising education and providing teaching materials; this also includes timetables, school passes, etc.
9. Finance	personal data for calculating, recording and collecting registration fees, school and/or tuition fees, contributions or reimbursements for teaching materials and extracurricular activities (for example, a bank account number).
10. Visual material	photographs and video footage of school activities on the basis of consent; Please note: Consent is not required for passport photographs for identification purposes (school pass and as an addition to the student file).
11. Teacher/inclusion coach, inclusion specialist, (lead) mentor	personal data of teachers and supervisors, insofar as these personal data are relevant to the organisation of the institution and the provision of education, courses and training.
12. PGN	schools are obliged to use the PGN (personal identification number) in their administration. The PGN is the same number as the BSN (Burgerservicenummer) when a BSN is available.
13. Chain-ID (Eck-Id)	unique ID for the 'educational content chain'. This enables schools to share personal data without them being directly traceable to students or teachers.