



KING'S SCHOOL
THE CROWN

SCHOOL DATA PROTECTION POLICY

Controller:

King's School The Crown

The Crown

Palm Hills 125666th October City, Giza

Data Protection Officer: dpo@inspirededu.com

Privacy policy: <https://www.kingsschoolegypt.com/privacy-policy>

POLICY REVISION LOG

CREATION	DATE OF CREATION	APPROVED BY	DATE	SIGNATURE
Patricia Sarrais, Inspired Global DPO	31/01/2023	Headteacher, Joel Worrall	01/05/2024	



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1. PURPOSE

King's School The Crown (also referred throughout this document as "*the School*") has as one of the main values the privacy and confidentiality of all people, especially those whose personal data we process. Within that commitment, the protection of our students' personal data is essential.

In accordance with the provisions above, the purpose of this policy is to provide you information about how we process your personal information. We also tell you how you can exercise your rights.

The School is strongly committed to compliance with the Law No. 151 of 2020 Promulgating the Personal Data Protection Law, as well as the rest of the applicable legislative bodies in matters of child protection and education among others.

It goes without saying that the School is committed to the protection of minors, and watches at all times for the safeguarding of their interests.

2. SCOPE

This policy is applicable to parents/guardians and students as well as board members, employees, interns, volunteers, contractors, in addition to individuals visiting the School's site.

King's School The Crown is the Controller as it processes personal data about current, past and prospective students and their parents, legal representatives or guardians (referred to in this policy as "*parents*") as well as the subjects mentioned above and third parties who, with their consent, communicate their personal information for specific purposes.

This data protection policy also applies in addition to other relevant terms and conditions and internal policies, including any contract between the School, staff, parents of students (and students themselves over age of legal competence).

3. TERMS & DEFINITIONS REFERRED IN THIS POLICY

"Personal Data": shall mean any data relating to an identified natural person, or one who can be identified directly or indirectly by way of linking such personal data and other data such as name, voice, picture, identification number, online identifier, or any data which determines the psychological, medical, economic, cultural or social identity of a natural person.

"Processing": shall mean any electronic or technological operation to write, collect, record, save, store, merge, display, send, receive, circulate, publish, erase, change, edit, retrieve, or analyze personal data using any electronic or technological medium whether partially or wholly.



“Sensitive Personal Data”: shall mean data which discloses psychological, mental, or physical health, or genetic, biometric or financial data, religious beliefs, political views, or criminal records. In all cases, data relating to children is considered to be sensitive personal data.

“Data Subject”: shall mean any natural person to whom electronically processed personal data is attributed which identifies him/her legally or factually and enable his/her identification from any other person.

“Holder”: shall mean any natural or juristic person, legally or factually, holds and retains personal data in any manner, or by any means of storage, regardless of whether that person initially created such personal data or was transferred to such person by any means.

“Controller”: shall mean any natural or juristic person who has - by virtue of the nature of their activities - the right to obtain Personal Data and to specify the method and criteria of retaining, Processing or controlling such data according to a specific purpose or to their activities.

“Processor”: shall mean any concerned natural or juristic person, by virtue of the nature of its work, to process Personal Data for its own benefit or on behalf of the Controller as agreed with and instructed by the Controller.

“Disclosing Personal Data”: shall mean any means which make Personal Data known to others such as by way of viewing, circulating, publishing, transferring, using, displaying, sending, receiving, or disclosing Personal Data.

“Data Security”: shall mean technological and organizational procedures and operations the purpose of which is to protect the privacy, secrecy, safety, unity, and completeness of Personal Data.

“Personal Data Infringement”: shall mean any unauthorized or illegal access to Personal Data, or any other illegitimate operation to reproduce, send, distribute, exchange, transfer, or circulate which aims to expose or disclose such Personal Data, or damage or edit the same while being stored, transferred or processed.

“Cross-Border Personal Data Transfer”: shall mean to transfer, make available, record, store, circulate, publish, use, display, send, receive, retrieve or process Personal Data from inside the Arab Republic of Egypt to outside or vice versa.

“Minor”: a data subject under the age of full legal responsibility related to data protection and especially the legal age to consent.

“Data Protection Officer (DPO)”: is a role with formal responsibility to ensure compliance with legal requirements according to Article (8) of the Law, acting as the legal representative of the juristic person of any of the controller or the processor.



“Data Protection Authority (DPA)”: it is a national authority responsible for the supervision of the implementation and protection of data and privacy as well as implementing and enforcing data protection Law. In Egypt is the Personal Data Protection Centre (the "Centre"), is a public economic authority that has a legal personality and is under the authority of the Minister of Communications and Information Technology.

“Profiling”: any automated processing that uses personal data to evaluate certain personal aspects related to an individual, regarding economic situation, location, health, personal preferences, reliability or behaviour without human intervention and which implies decision making or produces effects for the individual.

“Representative”: a natural or legal person which acts on behalf of the data subject, e.g., legal tutor of a minor.

“Third party”: is any natural or legal person, public authority, agency, or any other body who, under the direct authority of the School, are authorised to process data for specific purposes.

“Legitimate interests”: are referred to the rights and freedoms of those individuals which could be affected by the data processing carried out by a company or organisation. The purposes of the data processing must be based on legal ground.

“Rights of the data subjects”: Data subjects can request the exercise of their rights to the companies that process their personal data. You can review them at paragraph 7 of this policy.

“Parental responsibility”: means the legal rights, duties, powers, responsibilities and authority a parent has for a child and the child’s education. A person who has parental responsibility for a child has the right to be informed and make decisions about their academic information, care and upbringing. Important decisions in a child’s life must be agreed with anyone else who has parental responsibility.

4. DATA PROTECTION PRINCIPLES

The School will comply with the following conditions when collecting and processing data:

1. Personal Data shall be collected for *legitimate, specific, and transparent purposes* to the Data Subject.
2. Personal Data shall be *correct, valid, and secured*.
3. Personal Data shall be processed in a *legitimate manner* and in compliance with the purposes for which it is being collected.
4. Personal Data *shall not be retained* for a period longer than that is necessary for the fulfilment of the purpose thereof.

5. WHAT INFORMATION DO WE COLLECT?

The School collects the following type of information:



1. Information about students, their parents or tutors and their representatives, provided directly by them or their authorised persons;
2. Information about job applicants, staff members, interns, volunteers, visitors, contractors, customers, advisors as well as those of its affiliates and third party agents engaged in supporting the School business, provided directly by them or their representatives;
3. Information about third parties or potential students or clients interested in the School services and who provided their consent to the processing of their data for the purposes set forth in this policy.

6. HOW DO WE COLLECT YOUR PERSONAL DATA

- a. Personally and over the phone: from students and their family, or representatives, staff, visitors, contractors, job applicants and others;
- b. From electronic and paper documentation: including job applications, emails, invoices, enrolment forms, letters to the School, medical forms, consent forms (for example: enrolment, extracurricular activities, etc), our school's websites or the School controlled social media;
- c. Our website, through our cookies;
- d. Online tools: such as educational apps and other software used by the School;
- e. Photographs or other audio-visual contents for educational or commercial purposes with due information and consent of the data subject;
- f. CCTV cameras located at our School;
- g. Any other means that may be necessary.

7. YOUR RIGHTS IN DATA PROTECTION

Personal Data may not be collected, processed, disclosed, or revealed by any means except with the explicit consent of the Data Subject or where otherwise permitted by law.

The Data Subject shall have the following rights to:

1. Know, review and access/ obtain his/her own Personal Data, which is in possession of any Holder, Controller or Processor;
2. Withdraw the prior consent concerning the retention or Processing of his/her Personal Data;
3. Correct, edit, delete, add or update his/her Personal Data;
4. Limit the Processing to a specified purpose;
5. Be notified with any infringement to his/her Personal Data; and
6. Object to the Processing of Personal Data or its results whenever the same contradicts the Data Subject's fundamental rights and freedom.



With exception right 5 of the above paragraph, the Data Subject shall pay the consideration for the service provided to the data subject by the Controller or the Processor with respect to the exercise of said rights. The School shall issue decisions to determine such consideration which shall not exceed EGP 20,000 (twenty thousand Egyptian pounds).

You can exercise your rights or get more information by sending us a written request and a copy of your passport or ID number in order we can identify you to: dpo@inspirededu.com.

You can also send a complaint to *Minister of Communications and Information Technology, Personal Data Protection Centre* at: MCIT Headquarters, Ministry of Communications and Information Technology, Smart Village, Kilo 28- Cairo-Alexandria Road, Egypt. Phone Number: (+202) 35341300

8. LAWFUL BASIS FOR DATA PROCESSING

8.1 Legitimation:

The processing of data will be carried out under the following legitimation basis:

1. **CONSENT:** The processing is carried out upon the Data Subject's consent for the achievement of certain purpose(s);
2. **CONTRACT:** It is necessary and intrinsic for the performance of a contractual obligation or legal action, the execution of an agreement for the benefit of the Data Subject, or the undertaking of any procedure with respect to claiming or defending the Data Subject's legal rights;
3. **LEGAL OBLIGATION:** It is necessary for performing a legal obligation or an order issued by the competent investigation authorities, or it is based upon a judicial ruling; or
4. **LEGITIMATE RIGHTS:** It is necessary for enabling the Controller to perform its obligations or any relevant person to practice its legitimate rights unless the same contradicts the Data Subject's fundamental rights and freedom.

8.2. **Purposes:** The purposes of data processing are the following:

1. For the purposes of student selection (and to confirm the identity of prospective students and their parents);
2. To provide education services, physical training or spiritual development, career services, extra-curricular activities and monitoring students' progress and educational needs;
3. To provide school transport services, catering, specialised care, etc;
4. Maintaining relationships with *Alumnae* and the School community, including direct marketing or fundraising activity;
5. For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;



6. For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
7. To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
8. To give and receive information and references about past, current and prospective students, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past students;
9. To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School;
10. To safeguard students' welfare and provide appropriate pastoral care;
11. To fulfil the School's contractual and legal obligations;
12. To monitor (as appropriate) use of the School's ICT and communications systems
13. To make use of photographic images of students in the School's publications on the School's website and (where appropriate) on the School's social media channels;
14. For security purposes, including CCTV;
15. Besides the aforementioned uses, regarding the School's staff for the selection and recruitment, processes, professional background, assessment of suitability and qualification for the position, criminal records, hiring, payroll, entries and removals in the personnel registers, etc.;

And

16. Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

8.3 Sensitive personal data: In addition, the School may need to process a special category of personal data (e.g., concerning health or religion) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

These reasons may include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for attending special needs, medical advice, social services, insurance purposes or to organisers of School trips;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- To provide Summer Camps activities and Global Exchange Programme services;



- In connection with employment of its staff, for example criminal background checks, welfare or pension plans;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to follow the legal obligations and duties of care.

9. TYPES OF PERSONAL DATA PROCESSED

This will include by way of example:

1. Names, addresses, telephone numbers, e-mail addresses and other contact details;
2. Photograph for identification purposes;
3. Car details (for those who use our car parking facilities);
4. ID numbers, passports, insurance, background checks;
5. Bank details and other financial information, e.g. about parents who pay fees to the School;
6. Past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), employment information and examination scripts and marks;
7. Past, present and prospective parents' employment information, family status, documents issued by a Court or by a public authority, powers of attorney, etc;
8. Where appropriate, information about individuals' health, and contact details for their next of kin;
9. References given or received by the School about students, and information provided by previous educational establishments and/or other professionals or organisations working with students;
10. Images of students, staff, parents, visitors or other third parties captured by the School's CCTV system (in accordance with the School's policy on Taking, Storing and Using Images of Students);
11. Information relating to past, present and prospective School personnel.

The School also processes data from its staff, suppliers, interns, volunteers, officers, agents, contractors, advisors as well as those of its affiliates and third party agents engaged in supporting the School.

The purposes for which the School use personal information of the aforementioned data subjects may include, among others:

- Administering the individual's employment or contract, as the case may be.
- For insurance purposes.
- Marketing purposes.
- To satisfy the School's legal obligations, specially related to child protection legislation.

10. CROSS-BORDER PERSONAL DATA TRANSFER



The School may need to transfer information about the student to a new school for the purpose to comply with any educational purpose. This may include copies of the student's school records and health information. This enables the new school to continue to provide the services for the education of the student, to support the student's social and emotional wellbeing and health and to fulfil legal requirements among other obligations.

As the School is integrated into the INSPIRED international network of schools, it is possible for the student to study at any of the group's schools, so data communication between the schools will be necessary, including international data transfer if appropriate, within the legal conditions and in all cases under the appropriate safeguards. In the same way, data may need to be processed or stored outside Egypt.

In this case, transfer of personal data to a foreign country, or its storage or sharing may only be undertaken if the level of data protection or security in the foreign country meets (or exceeds) the requirements stipulated under this Law, and subject to obtaining a relevant license or permit.

The appropriate legal safeguards will be adopted for transferring, storing, sharing, processing or disclosing Personal Data across borders.

11. STORING AND SECURING INFORMATION

The School shall use the appropriate security measures to ensure the security, confidentiality, integrity and privacy of the personal data, preventing from unauthorised access or unlawful processing against accidental loss, destruction or damage of the files.

12. UPDATING YOUR INFORMATION

The School endeavours to ensure that the information that we process is always accurate, complete and up to date. To update your information, please contact the corresponding department.

13. SHARING YOUR INFORMATION WITH THIRD PARTIES PROVIDERS

The School will only share your information with third parties on a *need-to-know basis* and with your consent except in cases relating to legal requirements, vital interests and safeguarding of children, criminal activity, or if required by legally authorised bodies (e.g., Courts, police, social services, etc). If we decide to share information without parental consent and strictly under the cases stipulated by Law, we will record this in the student's file, clearly stating our reasons.

In other cases, some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the daily operation of our School, for example to provide extracurricular activities or other services coming from external professionals, the School will sign the corresponding agreements with the counterparty adopting the legal requirements.



14. PARENTAL RESPONSIBILITY

In cases of shared parental rights, regardless of who has legal custody, both parents have the right to receive the same information about the circumstances that occur in their child's educational process, which obliges the School to guarantee the duplication of the information unless a judicial resolution is provided that establishes the deprivation of parental rights to any of the parents to some type of criminal measure prohibiting communication with the minor and / or his/her family. All conflicts that could arise between parents in this regard must be brought before a family and juvenile court.

Parents will have the right to access to the academic and educational information of their children, even if they are of legal age or emancipated, as long as they incur alimony or education or food expenses, in which case the legitimate right of information of the parents will prevail on the privacy rights of the student of legal age or emancipated.

15. SENDING COMMERCIAL COMMUNICATIONS

The School may send you information or materials such as prospectuses, leaflets, newsletters, etc by e-mail or postal mail under your consent.

You can withdraw your consent at any time, so if you do not want to receive promotional information, please send us an email with your name, and surname, a copy of your ID number, your mailing address and your request to: dpo@inspirededu.com.

As soon as we receive it, we will take reasonable steps to remove your name from such lists.

16. CONSENT TO USE YOUR IMAGE

The School emphasises the importance of celebrating pupil success and as such photos and videos of our pupils are often used to showcase their skills and talents, as well as the day-to-day life of the school.

The School is committed to the protection of the image of our students and we take compliance with data protection regulations very seriously, especially regarding consent to the publication of audio-visual contents and the protection of confidentiality and privacy of our students, staff and other people who may appear in our publications.

At the beginning of the school year, the School requests authorisation to share the students' audio visual contents on the School websites, marketing, social media channels, press and extracurricular activities. Students of legal age can give their consent by themselves without parental authorisation without prejudice to parental supervision.



The School will never disseminate any photograph or video without the parents or data subject's previous consent.

On the other hand, although it is allowed for parents to take pictures of their children in special and organised events and celebrations within the schools facilities, the School is not responsible for the use that parents make of the images nor for claims of third parties that may appear in the photographs of the parents without their consent.

Accordingly, and in order to protect the safety and privacy of students and parents in the School's facilities, it is strictly forbidden to record videos or take photographs within the facilities except in specific organised events or circumstances in which it is permitted and with the limitations set forth above.

In cases in which the student's image will be used for specific advertising purposes, the School, through the central marketing services, will send parents the corresponding information about the use of the images and its duration as well as a sample of the photographs to be used, ensuring your consent. Similarly, your consent will be collected annually for the taking and use of your child's image for the school yearbook.

In relation to the activities carried out outside the school, the consent of parents or students with legal age is required when these activities are not carried out in the exercise of the educational function. When the recording or taking of photos is done by third parties, that is, by those responsible for the activity or institution that is visited by the students, it will be the obligation of these third parties to obtain the consent through the school.

In addition, the School does not authorise the use of the contents of its publications by third parties nor is reliable for the responsibilities that may arise for these third parties from these unauthorised uses.

You can also withdraw your consent for photographs at any time in the same terms as exposed above.

17. PERIOD OF RETENTION

Personal information will only be retained for the legal period of time required to fulfil the purpose for which it was collected. Once the personal information is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

18. DATA ACCURACY



The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the School at least on an annual basis of any changes to information held about them. Responsibility for changes in information relating to students rests with the parents.

The data subject has the right to request that any inaccurate or out-of-date information about them is erased or corrected.

19. COOKIES

The School website tracks web browsing patterns to better understand how our website is being used. This generic information is collected through the use of session cookies. The cookies used by our websites are associated with an anonymous user and their computer, and they are not related to the user's personal data.

The cookies used in our websites are all temporary, with the sole purpose of making future transmission more efficient. In no case will the cookies be used in order to collect personal data. We may update the cookies policy from time-to-time by posting a new version on the web pages.

20. EDUCATIONAL APPLICATIONS

The School uses a school management information system (MIS) as well as different educational and learning platforms to complement teaching (cloud computing services). These platforms may store and process sensitive data of parents, teachers and students strictly for internal and educational purposes. The teachers request, prior to their use, authorisation from the School. Each authorisation request involves the assessment of the application from the point of view of data protection and information security terms.

All users of these platforms have restricted access through convenient passwords.

The use of such educational platforms does not imply at any moment the transmission of student data to the application's service provider so that they can use such data for their own purposes or store the data permanently. The school will always retain its right to access to student's data and its deletion when deemed appropriate.

These platforms are in strict compliance with the data protection legislation and assure the adoption of sufficient guarantees in case there is an international data transfer.

This policy will be regularly reviewed and updated to take account of new laws in force, new technologies and the changing of the School environment when required. Please ensure you have read the current version of this Policy.



You can get more information by sending us a request at: dpo@inspirededu.com

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