

### **1. Purpose**

The purpose of this Data Protection Policy is to delineate the procedures by which ETIA Academy (hereafter referred to as "the School") collects, processes, stores, and safeguards personal data. The School is dedicated to ensuring the privacy of its students, staff, and other stakeholders, as well as complying with pertinent data protection legislation, including the General Data Protection Regulation (GDPR) and relevant local laws.

### **2. Scope**

This policy applies to all individuals associated with the School, including:

- Faculty and administrative staff
- Enrolled students
- Parents and guardians of students
- Third-party service providers engaged in processing data on behalf of the School

### **3. Data and Information Collection**

The School collects various categories of personal data that are essential for fulfilling its educational objectives. This data may include, but is not limited to:

- Identity Data: Name, date of birth, nationality, gender
- Contact Information: Residential address, email address, telephone number
- Academic Records: Details of enrolment, academic achievements, attendance records, assessments
- Health Information: Relevant medical information critical for the well-being of students
- Financial Data: Payment information pertaining to tuition and fees
- Usage Data: Information related to the access and utilization of the School's online platforms

Data collection occurs through secure online registration forms, surveys, and direct communications with school personnel. This information is necessary for enrolment, effective communication, and the provision of support services.

### **4. Purpose of Data Processing**

The School processes personal data for a variety of specified purposes, including:

- Educational Administration: To effectively manage student admissions, registrations, and academic tracking, as well as to communicate essential information to stakeholders.
- Support Services: To provide necessary support services catering to student well-being and academic success, which may include health and safety accommodations.
- Financial Management: To handle billing processes, payment transactions, and relevant financial communications with families.

- Legal Compliance: To fulfil regulatory obligations, comply with government reporting requirements, and facilitate auditing activities.
- Communication: To disseminate newsletters, notifications, and information regarding school events and activities.

## **5. Information Sharing and Disclosure**

ETIA Academy prioritises the confidentiality of personal data and will refrain from sharing this data without proper consent, except under specific conditions:

- With Consent: Personal data may be shared when explicit consent is provided by the individual or their parent/guardian.
- Legal Obligations: Disclosure may occur when required to comply with legal requirements or court orders.
- Third-Party Service Providers: Personal data may be shared with external service providers who perform essential functions related to educational services. These providers are bound by confidentiality agreements and restricted to using the data solely for the permitted purposes.

## **6. Data Security**

ETIA Academy is committed to implementing comprehensive security measures to protect personal data. All sensitive data is securely stored, with access restricted to authorized personnel only. ETIA Academy implements appropriate security measures to safeguard personal information against unauthorized access, loss, or misuse. which include:

- Technical Protectives: Utilisation of encryption, firewalls, and secure servers to safeguard data from unauthorized access.
- Organisational Protectives: Conducting regular risk assessments, providing data protection training for employees, and establishing access protocols based on necessity and role.
- Incident Response Protocol: Developing a structured response plan to address data breaches or security incidents, which includes immediate measures to mitigate risks and notification procedures for affected parties.

## **7. Data Retention**

ETIA Academy will retain personal data only for the period necessary to fulfil the purposes for which it was collected or as mandated by governing laws. Specific retention periods will be established for different categories of data, and information that is no longer required will be disposed of securely or anonymized.

## **8. Rights of Individuals**

Individuals possess the right to access their personal information and request corrections as necessary. Additionally, they may withdraw consent for information sharing at any time, consistent with applicable legal or contractual obligations. Individuals are entitled to certain rights regarding their personal data as outlined by applicable data protection laws:

- **Right to Access:** Individuals have the right to request copies of their personal data maintained by the School.
- **Right to Rectification:** Individuals have the right to request the correction of inaccurate or incomplete personal data.
- **Right to Erasure:** Under certain conditions, individuals may request the deletion of their personal data.
- **Right to Restrict Processing:** Individuals may request a limitation on the processing of their personal data under specified situations.
- **Right to Data Portability:** Individuals can request to receive their personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Individuals hold the right to object to the processing of their personal data in certain circumstances.

Requests for the exercise of these rights should be submitted in writing to the School's Data Protection Officer (DPO) using the contact details provided below.

## **9. Review and Updates**

This Data Protection Policy will be reviewed on an annual basis, or more frequently should the need arise, to ensure adherence to legal requirements and alignment with best practices in data protection. Stakeholders will be notified of any significant revisions to this policy.

## **10. Compliance and Enforcement**

All staff and associated stakeholders are required to comply with this policy. Any infractions of this policy or relevant data protection laws will be regarded with seriousness and may lead to disciplinary actions, legal proceedings, or termination of contracts with third-party service providers.

This policy is effective as of September 2024 and will be communicated to all relevant parties. It is imperative that individuals familiarise themselves with its contents and comply with the guidelines set forth herein to ensure the protection of personal data at ETIA Academy.