



# **Pupil Privacy Notice**

## **Nursery to Year 8**

**Reviewed July 2022  
by Education Director  
Aldenham Education Group (PMD)**

## **Pupil Privacy Notice – Nursery to Year 8**

### **Introduction**

Aldenham Prep Riyadh is a “data controller”. This Privacy Notice is to help you understand how and why we collect your child's personal information and what we do with it. Also explained are the decisions that you can make about your child's information. We are giving you this Privacy Notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 13) they will be considered mature enough to exercise their own data protection rights and will be issued with a separate Privacy Notice.

### **Data Protection Manager**

We have appointed Mrs S Ishaque, as the Data Protection Manager (DPM) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the DPM. You have the right to make a complaint at any time to the Saudi Data & Artificial Intelligence Authority (SDAIA) and/or the National Data Management Office (NDMO) under the Saudi Arabia Personal Data Protection Law, the supervisory authorities for data protection issues in the Kingdom of Saudi Arabia.

### **Data Protection Principles**

We will comply with data protection law. This says that the personal information we hold about your child must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **What is "personal data"?**

Personal information is what identifies your child and is held by us. This includes information such as their date of birth and address as well as things like exam results, medical details and behaviour records. The School may also record your child's religion or ethnic group. CCTV, photos and video recordings of your child are also personal information.

### **How and why does Aldenham Prep Riyadh collect and use personal data?**

Below are examples of the different ways in which we use personal information and where this comes from. Our primary reason for using your child's information is to provide them with an education.

The admissions forms which you complete provide us with personal information. We also get information from your child, their teachers and other pupils. In the Prep and Senior School, your child's old school or nursery (if applicable) may have also provided us with information about them as we need this to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after your child. We collect this information to help the School run properly, safely and to let others know what we do. Here are some examples:

- We need to tell appropriate members of staff if your child is allergic to something or has a health issue.
- We might tell your child's teachers if he or she has educational learning needs or requires extra help with some tasks.
- We may need to share information about your child's health and wellbeing with the School Health Centre or counsellor.
- We use CCTV to make sure the School is safe. CCTV is not used in private areas such as changing rooms.
- We record your child's attendance and if they have time away from the School, we record the reason(s) why.
- We may need to report some of your child's information to the government (e.g. the Ministry of Education). For example, we may need to tell the Ministry that your child attends Aldenham Prep Riyadh or let them know if we have any concerns about your child's welfare.
- When we are inspected by an official inspection body, we may have to share your child's information with them to assist with the inspection.
- If the School receives a complaint or grievance which involves your child, we may need to use their information to deal with this appropriately e.g. if you make a complaint or if another parent complains about an issue which involves your child.
- We may need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and the wellbeing of other pupils.
- If your child is from another country, we have to make sure that they have the right to study in the Kingdom of Saudi Arabia. We might have to provide their information to the Ministry of Interior.
- Depending on where your child will go when they leave us, we may need to provide their information to other schools and colleges e.g. we may share information about their exam results and provide references relating to school performance.
- We may need to share information with the police or our legal advisors if something goes wrong or to help with an inquiry.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your child's information with them if this is relevant to their work. They will not be able to use your child's data for any other purpose or share it with other parties.
- If your child has misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your child's academic and (where fair) their behaviour records with you or their education guardian so you can support their schooling.
- We will only share your child's information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would

normally.

- We will monitor your child's use of email, the internet and mobile electronic devices e.g. Surface Go devices. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm.
- We may take photographs or videos of your child at events to use on social media, on our website or in other marketing communications. This helps us show prospective parents and pupils what we provide and to promote the School. We may seek specific consent before using a photograph or video recording of parents and pupils where we consider that the use is more privacy intrusive. We may continue to use these photographs and videos after your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson. If you have any concerns about us using photographs or videos of your child, please contact the School Office.
- We publish sports fixtures and other news on the website and put articles and photographs in the local news and on Social Media to tell people about what we have been doing. In these cases we will refer to your child only by their first name. If we wish to use the whole name, we will seek specific consent.
- We sometimes use contractors to handle personal information on our behalf. The following are examples:
  - IT consultants who might access information about your child when checking the security of our IT network.
  - IT Developers who help us to develop our admissions management information systems will see your child's information when helping us with errors or developing the platform
  - We use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.
- The majority of the Personal Data collected by us will remain within the School. However, in order to help support the School and as part of its oversight responsibilities, key authorised members of staff from The Aldenham Foundation in the UK will have access to cloud computer systems which contain your child's data. In all cases it will be handled only by people who need to know the information.

Again, if you have any concerns about any of the above, just ask us.

### **Sending information to other countries**

We may send your child's information to countries which do not have the same level of protection for personal information as in the UK or KSA. For example, we may;

- Store your child's information on cloud computer storage based overseas; or
- Communicate with you about your child by email when you are overseas (for example, when you are on holiday).

In the former case, we use only reputable and trusted suppliers who have top level security and sign up to either the PDPL from KSA or GDPR from the UK/EU.

### **Data Retention**

We will only retain your child's personal information for as long as necessary to fulfil the purposes we collected it for. This includes for the purposes of satisfying any legal, accounting, or reporting requirements. To determine

the appropriate retention period for personal data, we consider the amount, nature, and sensitivity as well as the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your child's personal information so that it can no longer be associated with them, in which case, we may use such information without further notice to you. Once your child is no longer a student at the School, we will retain and securely destroy their personal information in accordance with applicable laws and regulations.

## **Our legal grounds for using your information**

This section contains information about the legal basis that we are relying on when handling your child's information as described above.

### Legitimate interests

This means that we are using your child's information when this is necessary for our legitimate interests except where this would be unfair to your child. We rely on legitimate interests for many of the ways in which the School uses your child's information. Specifically, the School has a legitimate interest in:

- Safeguarding and promoting your child's welfare and the welfare of other children.
- Promoting the objects and interests of the School. This includes using photographs of your child in promotional material such as on our website and in the prospectus.
- Helping the School comply with its obligations (for example, when it is inspected).

Additionally, your child's personal information may be processed for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another. If you object to us using your child's information where we are relying on our legitimate interests as explained above please speak to us.

### Contractual Obligation

The following is an example of when we use your child's information to comply with our legal obligations:

- Providing your child with an education.

### Legal obligation

Where we need to use your child's information in order to comply with a legal obligation e.g. to report a concern about their wellbeing to a Health Professional. We may also have to disclose your information to third parties such as the courts, a Government Ministry or the police where legally obliged to do so.

### Vital interests

In limited circumstances we may use your child's information to protect their vital interests or the vital interests of someone else. For example, to prevent someone from being seriously harmed.

### Performance of a task carried out in the public interest

The following are examples of when we use your information to perform tasks in the public interest:

- Safeguarding and promoting your child's welfare and those of other children.
- Ensuring that we comply with all of our legal obligations.

If you object to us using your information when we are relying on this ground, please speak to us.

## Consent

We may ask for your consent to use your child's information in certain ways. If we ask for your consent to use your child's personal information you can take it back at any time. Any use of your child's information before you withdraw your consent remains valid. Please speak to us if you would like to withdraw any consent given.

## **Special Categories**

We must also take extra care when we process special categories of personal information. These special categories are personal information revealing, for example, racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about alleged criminal offences and court proceedings.

## **What decisions can you make about your child's information?**

From March 2022 in Saudi Arabia, data protection legislation gives you a number of rights. Some of these are new whilst others build on your existing ones. Your relating to your child's personal information are as follows:

- If information is incorrect, you can ask us to correct it.
- You can also ask what information we hold about your child and be provided with a copy.
- You can ask us to delete the information that we hold in certain circumstances e.g. where we no longer need the information.
- You can ask us to send you, or another organisation, certain types of information about your child
- You can request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent without affecting the lawfulness of our processing based on consent before its withdrawal).
- You can object on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.
- Our use of information about your child may be restricted in some cases. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.

Please note that the above rights are not absolute and we may be entitled to refuse requests where exceptions apply. The School will endeavor to respond to any such requests as soon as is reasonably practicable (actually fulfilling more complex or multiple requests, e.g. those involving third party information may take some time). but, in any event, we will respond within statutory time limits

## **Further information and guidance**

Please speak to us if:

- You object to us using your child's information for marketing purposes e.g. to send your child information about school events. We will stop using their information for marketing purposes if you tell us not to.
- You would like us to update the information we hold about your child.
- You would prefer that certain information is kept even more confidential than would normally be the case.