

## **Data Protection Policy for Students January 2023**

### **Vision**

Inspiring kind and joyful learning communities who use innovative thinking to build a mindful and sustainable world.

### **Mission**

Verita ensures that kindness is the centre of everything we do. Deeply committed to international and intercultural understanding, Verita provides an academically engaging, inquiry-based educational approach.

Our responsibility is to whole-heartedly assist our students to develop the social-emotional and academic skills necessary to live meaningful, fulfilled and happy lives.



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## **AIM**

Verita International School processes personal data on its prospective, current and former students and their parents or legal representatives, as part of its everyday operations of providing educational services.

Verita is aware of its responsibilities under data protection legislation and will fulfil those responsibilities for both staff and pupils.

Verita will take account at all times of the data protection requirements and it handles the personal data according to the General Data Protection Regulation no. 679 / 2016 applicable in the European Union (“GDPR”).

For these purposes, Verita acts as controller with regard to the personal data, meaning

Verita establishes the purposes and means of processing the Personal Data.

For the purposes of this privacy policy, please note that the term “processing” shall represent any operation performed on Personal Data, whether by automated means such as collection, recording, storage, adaptation, alteration, consultation, use, disclosure by any means, erasure or destruction.

Verita will register annually with any Greek Government office to do with Data Information.

Verita wishes to be completely transparent regarding the processing of Personal Data and, therefore, we have presented below all the information needed on this subject matter. See also Verita Data Protection and Confidentiality Policy for Staff.

## **DATA PROTECTION OFFICER (DPO) The DPO:**

- Will ensure that high standards of data security and confidentiality are always maintained during data processing and data handling conducted onsite;
- Will coordinate, monitor and oversee appropriate training in data management and encourage a positive data culture and best practice;
- Will advise on all data issues and will assess the severity of data breaches and respond accordingly;
- Will implement any policies issued by the Verita regarding data protection
- Will ensure safe and confidential systems are in place in Verita and will provide information to bodies entitled to receive information.



*To exercise any of the rights provided in the present policy or to obtain additional information or clarifications about processing the Personal Data please contact Verita via its appointed Data Protection Officer – responsible for ensuring that Verita complies with all the requirements of the GDPR, as detailed below.*

*Verita International School's Data Protection Officer: Romina Pici*

*Phone Number: 21 141 999 94*

## **CATEGORIES OF PERSONAL DATA BEING COLLECTED AND PROCESSED**

The categories of personal data that Verita processes include, but are not limited to, the following:

- Identification and contact information (first and last name, citizenship, country of birth, address, information included in ID's / passports, phone number, e-mail etc.); Bank details;
- Health data: medical history, allergies, immunization records, disorders, medical examination results and other medical data of the students;
- Data related to the educational background and regarding school performance of the students: academic, disciplinary or other educational related records, academic references, special needs, hobbies, results of educational diagnosis testing, test results, feedbacks, evaluations etc.;
- Behavioural data as well as data on preferences / interests of students;
- Family information: household information, language background, profession and workplace of parents etc.;
- Authentication and physical access data: e-mail, passwords, badge number, location data, other on-line identifiers, car details etc.;

Photos and videos.

Generally, the Personal Data held by Verita. were provided directly by the parents or resulted from the interaction the parents and the students have with the school. In some cases, third parties (e.g., representatives of former schools attended by students) supply data.



## **PURPOSES FOR WHICH V.I.S. PROCESSES YOUR PERSONAL DATA: Verita**

processes the personal data that pertain to the parents or to the students for the following purposes:

- Provision of educational services, starting with the application process, enrolling students, administration of classes and timetable, teaching activities, administration of internal and public examinations, assistance regarding the application process to various universities, issuance of academic records.
- Provision of educational ancillary services: pastoral care, career and personal counselling, library services, extracurricular activities, school trips, managing school's publications, setting up the virtual learning environment and granting access to Verita International School's Intranet and Internet network as well as monitoring the use of Verita's network.
- Ensuring campus security: monitoring access on campus, performance of video surveillance.
- Provision of the medical care and counselling that students may need.
- School administration: handling student records and other academic documentation, administration of fees and accounts, internal audits and controls, reporting and statistics creation, implementing school policies, ensuring collaboration with other schools, archiving, assessing the quality of our services, facilitating research activities.
- School related communications: conveying various messages related to the students and Verita's activities by any communication means.
- Organizing fundraising activities and other school events (e.g., concerts, theatre productions, talent shows), including marketing communications related to the fundraising activities organized by Verita
- Dispute resolution and litigations.

## **THE LAWFUL BASIS FOR THE PERSONAL DATA PROCESSING OPERATIONS**

Verita collects and further processes Personal Data, based on one of the following legal grounds, expressly laid down by the GDPR:

- The consent the parents/the pupils have granted, prior to any processing of the personal data, for:
- the use of students' photographs and videos in various school publications, on Verita's website and social media pages;
- the use of their contact details for direct marketing communications on Verita's fundraising activities;
- other consents that may be granted from time to time for various processing activities.



For the performance of the enrolment contract, as well as in order to take steps at your request for entering into the enrolment contract and to further provide the educational services.

Please note that there are some mandatory categories of personal data necessary to Verita in order to conclude the enrolment agreement and provide the educational services to students at a high standard and in the best interest of the students.

The mandatory categories of personal data are included in the application form, which you have filled in on-line and listed in the enrolment contract you already have/ will sign with Verita. All the categories of data that are compulsory for contract conclusion are marked accordingly in the application form.

Please take into consideration, that all the mandatory categories of data are necessary for Verita to be able to evaluate your application and finally to enrol the child. Failure to provide all the information marked as mandatory will lead to the impossibility of Verita to process your application and to enter into a contract with you. A legal obligation that requires Verita to process the personal data (e.g. performance of video surveillance). For the performance of a task carried out in the public interest, considering that Verita provides educational services, regarded as a service of public interest, according to the Greek applicable provisions on education, many processing operations conducted by Verita that are strictly related to educational purposes will be founded on this lawful basis for processing. We refer here mainly to issuing and storing academic records, evaluating students' performance etc.

The legitimate interest pursued by Verita.

Verita relies on this legal ground in order to provide the educational services it has committed to deliver and additional services related to this scope at the highest standards, always for the benefit of the students and without outweighing the parents or the students' rights and liberties

Verita may invoke the legitimate interest legal ground in the following cases:

- monitoring use of the V.I.S.'s virtual learning environment and network, including monitoring the use of e-mails account provided by Verita
- conducting fundraising activities, including marketing of such activities;
- enforcement of legal claims, addressing complaints and third-party controls;
- management, control, reporting and performing statistics on school's activity;
- ensuring security;
- maintaining close relationships with alumni and V.I.S.'s community;
- collaboration with other schools and educational institutions;
- performance of agreements with suppliers, including insurance suppliers;
- access to grants and other funding sources.



With respect to the processing of the special categories of personal data under the GDPR, respectively health data, please take into consideration that V.I.S. processes health data based on the following legal grounds:

The necessity of the Medical Office to process such data for the purpose of preventive and occupational medicine, medical diagnosis and the provision of health or social care or treatment based on European Union or national law;

Processing is necessary for reasons of substantial public interest, based on European Union or national law. Such a legal ground is used especially in those situations where the school must assess the learning capacity of a student and adapt the teaching activities to the special needs of a student.

The explicit consent granted by you for the disclosure of the personal data of students related to the allergies they suffer from.

## **ACCESS TO INFORMATION**

All pupils at Verita have a right to access their own information under the General Data Protection Regulation. Pupils who can't act for themselves, or where the pupil gives permission, can have their parents access the information on their behalf.

Children are classed as vulnerable individuals under data protection law. Data disclosed and processed regarding, relating to and referencing children will be handled with the utmost sensitivity and confidentiality and in accordance with the terms of the General Data Protection Regulation.

This includes memos, notes, pupil records, CCTV footage and emails which hold 'information' about a child. Data will only be collected and retained at Verita for specific purposes and it will only be used for those purposes unless permission to use it for another purpose is sought from and given by the data subject through a clear and auditable process of consent.

Under the General Data Protection Regulation, parental consent is required to process the data of children under the age of 16 online where the processing, in an information services context, is reliant on consent. Consent is not required in the context of preventative or counselling services offered directly to a child.

Verita will ensure that communications with a child on welfare topics are clear and easy to understand regarding consent to care and processing of information. Parents can make educational record access requests by writing to the Advisory Board of Verita



Pupils can make requests for their educational record by writing to Verita. All requests involving educational records will be responded to within 15 school days. However, for requests only for information held outside the educational record,

Verita will respond within one month.

Members of staff are agents of V.I.S and information on children created, collected and retained by them in records and/or mark books is data for the purposes of this policy and is not confidential to the teacher concerned. The importance of diligent data security is stressed to staff and they will receive appropriate training to ensure the risk of breach is minimised.

### **Exemptions**

Information about other pupils contained in any accessed information will be redacted. Where it is impossible to redact information about other pupils, Verita may not be able to release some or all parts of the information held on file. Verita expects such situations to be rare.

Additionally, Verita may withhold information where serious harm may be caused to the pupil's physical or mental health or another individual, or where the request is for an exam script or exam marks before they have been officially published.

### **Medical**

Medical and matters concerning child protection will be kept in a confidential file. Only the Medical Office, the Principal and staff authorized by the Principal may have access to this file.

### **Exam Results**

Verita will respond to pupil requests for information about their exam performance, including their mark, comments written by the examiner and minutes of any examination appeals panels within one month. However, if the request comes before exam results have been officially published, this increases to within five months of the request date, or within one month from when the results are officially published (whichever is earlier).





## **Charges and Subject Identity**

The information shall be provided free of charge.

Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, Verita may either:

- Charge a reasonable fee considering the administrative costs of providing the information or communication or taking the action requested; or
- Refuse to act on the request.

Where Verita has reasonable doubts concerning the identity of the natural person making the request, Verita may request the provision of additional information necessary to confirm the identity of the data subject.

## **DISCLOSURE OF PERSONAL DATA**

Verita discloses the personal only to those members of Verita staff and collaborators, who need access to the personal data mainly for ensuring the provision of the educational and ancillary services.

In this respect, please take into account that only the Medical Office, the Principal and staff authorized by the Principal have access to the students' medical records. Other departments of the school have access to specific health data based on the consent you have expressed (i.e. for allergies) or in order to protect a substantial public interest based on Union or national law (e.g., various medical conditions triggering special learning needs).

With respect to the disclosure of your personal data to third parties, outside V.I.S., please note that such disclosure is performed solely in the regular activity of the school. The categories of recipients include the following:

- IT providers, including educational applications, on-line tools, server hosting suppliers;
- Providers of meal services on campus;
- Other educational institutions or organizations, not limited to other schools; Travel agencies, catering and transportation providers;
- Verita International School's photographer and video crew; Courier services providers;
- Utilities services providers;
- Public authorities and institutions, national or foreign, judicial courts and foreign embassies or other forms of diplomatic missions;
- Tax, legal and accounting consultants.



In addition of the above mentioned, no information will be released to other third parties except as required by law or where express consent has been granted by the data subject.

### **THIRD COUNTRY TRANSFERS**

Verita does not transfer your personal data to the third countries.

### **SAFE AND SECURE STORAGE OF FILES AND DATA**

The DPO will take necessary precautions to ensure that both electronic and manual files are secure.

No manual or electronic files will be taken off the premises except in an emergency, or when expressly authorised by the DPO, who will ensure that pupils and parents who are affected are notified and given an opportunity to make representations to him/her. This includes information held on personal computers and portable computing devices, including mobile phones and memory sticks. This list is not exclusive.

Verita will not disclose any information which could not be disclosed to the pupil him/herself under the General Data Protection Regulation.

Manual files will always be stored in a safe and secure lockable cabinet. Verita will take cyber security measures for the safe and secure storage of electronic files and data.

Verita will therefore:

- Protect networks from attack and monitor and test security controls in place to achieve this;
- Ensure users are educated, trained and aware;
- Produce and establish anti-malware defences across the school; Produce a policy to control all access to removable media;
- Apply security patches and ensure secure configuration of all systems is maintained;
- Establish effective management processes, limit user privileges and monitor user activity appropriately;
- Establish an incident response and disaster recovery capability;
- Establish an effective monitoring strategy of all systems and networks; and Develop and implement a policy on the use of mobile phones and train staff to adhere to it.

Verita have every confidence in the integrity of the data protection measures in place on site, but acknowledge that the loss of sensitive child data could constitute a serious breach which could place the wellbeing of a pupil at risk. Should a breach occur this must be reported promptly to the DPO, who will undertake an assessment of the risks to the rights and freedoms of individuals and disclose to the subject and supervisory authority if required.



Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay and in accordance with legislated timescales.

Concerns regarding how data is managed should be reported to the DPO.

### **RETENTION OF PERSONAL DATA**

Verita holds all your Personal Data for as long as you are in a contractual relation with us, and afterwards for a standard period of 5 year, period for which V.I.S. can justify a need in storing such personal data. Verita keeps the student file and all the data related to the student interaction with Verita mainly for the scope of assessing the school's activity and the quality of services provided but also for addressing potential request of students with regard to their school trajectory within Verita, which usually appear after the students have graduated.

Notwithstanding the retention period mentioned above, please be informed, that all the academic records and other school acts and documents related to study activities are kept for an indefinite period of time, according to the legal obligations that Verita has in this respect. Moreover, in any case where a legal provision imposes a minimum retention period, Verita will keep the Personal Data for at least that mandatory period.

### **BIOMETRIC INFORMATION**

Biometric data is a form of sensitive personal data under the General Data Protection Regulation. Processing of sensitive personal data may only be undertaken if the data subject has given explicit consent to the processing of personal data for one or more of the following specified purposes; processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law; processing is necessary to protect the vital interests of the data subject or of another natural person; processing relates to personal data which has been manifestly made public by the data subject.

Consent will be sought in a clear and auditable fashion from parents and the child's right to refuse this information will be respected. Verita will seek to provide equally convenient systems for accessing school facilities and services to children whose parents refuse permission or who withdraw it. Verita will not collect or use biometric information about children except in accordance with the law.

A Data Protection Impact Assessment is mandatory when a process is likely to result in a high risk and the processing of sensitive child data in this manner will require a complete and maintained Data Protection Impact Assessment. It is the responsibility of the controller to complete this resource, who will receive advice and monitoring assistance from the DPO.



## **RECORD KEEPING**

The General Data Protection Regulation requires the retention of records of processing activities. Verita will hold the personal data and sensitive personal data of children in accordance with the regulation, securely, accountable and comprehensively for the retention periods outlined in the Data Protection Policy, before secure disposal.

## **MARKETING MATERIAL**

No information about pupils at Verita will be provided to marketing companies, unless the person(s) concerned have given explicit consent which is auditable and can be withdrawn without detriment.

## **DISCLOSURE REQUESTS**

Members of staff who receive requests for references or other information about current or past pupils at Verita should inform the D.P.O. before providing the information to ensure that they are acting within the law and official guidance

## **MONITORING THE USE OF ELECTRONIC COMMUNICATIONS**

Verita will keep all monitoring within the provisions of the General Data Protection Regulation and the European Convention of Human Rights.

Verita will not intrude into the private lives of pupils but reserves the right to monitor the use of all electronic devices issued or made available by the Verita. such as school computers, laptops, video and audio machines, phones and fax machines. This will only be done where there is a good reason to do so and appropriate records will be kept, which can be accessed by pupils (and staff) on request to the DPO.

Verita will use its powers to confiscate and search electronic equipment brought into school by pupils where it reasonably believes that this is necessary for the protection of other individuals or the detection or prevention of offences.

Verita have the right to vet communications without the consent of the caller, writer or recipient where the intention is:

- To establish the existence of facts applicable to the business;
- To ascertain compliance with regulatory or self-regulatory practices or procedures which are;
- To ascertain or demonstrate the standards which are achieved or ought to be achieved by persons using the system in the course of their duties;
- In the interest of national security;
- For the purpose of preventing or detecting crime;
- For the purpose of investigating or detecting the unauthorised use of that or any other telecommunication system;
- In order to secure or as an inherent part of the effective operation of the system;



- Monitoring communications for the purpose of determining whether they are communications relevant to the system controller's business; and
- Monitoring communications made to a confidential voice-telephony counselling or support service which is free of charge (other than the cost, if any, of making a telephone call) and operated in such a way that users may remain anonymous if they so choose.

All pupils are advised that such monitoring might take place at Verita for these purposes including for the misuse of Verita equipment or its use for inappropriate purposes. Verita may discipline pupils for such misuse.

The employer will establish with the Principal, after consultation with the staff, a policy on how telephones/fax and computers may be used for any private communications. Breach of this code once established will be a discipline offence.

### **THE RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA BY V.I.S.**

The General Data Protection Regulation provides certain rights related to the processing of personal data, that both the parents and the students have. In this respect, please be informed that students that have an appropriate level of understanding could exercise the rights listed in this section, individually.

Verita respects all the rights mentioned under the General Data Protection Regulation and is committed to furnishing the appropriate means by which you can exercise these rights, according to the details mentioned below:

- applicable to the system controller in the carrying on of his business, or
- applicable to another person in the carrying on of his business where that person is supervised by the system controller in respect of those practices or procedures

The right of access, which entails your possibility to obtain the confirmation from Verita whether your Personal Data is being processed by Verita or not, and if the case may be you are entitled to solicit access to this data, as well as additional information regarding the Personal Data, such as: the purposes of processing, the categories of recipients the Personal Data are being disclosed to and the envisaged retention period. In the situations where you may need to exercise the right of access, please consider contacting Verita International School and requesting confirmation or access to your Personal Data. Please consider that there might be specific situations that are exempted from the right of access, such as information that identifies other individuals or which is subject to confidentiality obligations.

The right to rectification, that allows you to request Verita rectification of any inaccurate Personal Data that Verita may hold, as well as to have your incomplete Personal Data to be completed.



The right to erasure meaning that in the situations expressly regulated by law, you may request erasure of your personal data. Please take into consideration that the cases where the law provides for the possibility of erasure of personal data amount to the situations where the processing is unlawful or where the processing is based on your consent, and you have withdrawn such consent.

The right to restriction of processing, signifying your right to obtain restriction of processing your Personal Data from Verita's part. Please bear in mind that this right can be exercised only in specific situations laid down by the General Data Protection.

Regulation such as when you challenge the accuracy of your Personal Data. During the period necessary for us to rectify your data, you may ask us to restrict the processing of your Personal Data.

The right to data portability implying your right to receive the personal data in a structured, commonly used and machine-readable format and further to transmit such data to another controller. This right to data portability shall be applicable only to the personal data you have provided to us and where the processing is carried out by automated means based on your consent or for the performance of the contract you have concluded with Verita.

The right to object to the processing of your Personal Data by Verita, on grounds relating to your particular situation. The right to object applies to the situations where Verita relies on consent as legal basis for processing (e.g. using your e-mail address for conveying fundraising related messages).

The right to lodge a complaint designates your right to challenge the way Verita performs processing of your Personal Data with the competent data protection authority.

The right to withdraw your consent given for various processing operations, in cases where the consent represents the lawful basis for processing. In cases where you withdraw your consent to processing your Personal Data, please note that the processing will end from the moment the withdrawal takes place without any effect on the processing that took place prior such withdrawal.

## **PROFILING**

Verita creates various profiles through automated means based on the Personal Data that pertain to students. Generally, such profiles are created via various applications used in the on-line education environment.

Verita creates and uses such profiles to evaluate the performance of its students, to identify gaps in their development or to assess specific traits that characterize students' personality, preferences, and behavior or professional inclinations.



## **DATA BREACHES**

All data breaches must be reported to the DPO.

The DPO will assess whether or not the data breach poses a high risk to the rights and freedoms of data subjects. In this case, the breach must be notified to the supervisory authority within 72 hours and the affected individuals without undue delay by the DPO. There is no requirement to report a breach to the data subject and supervisory authority if the breach is unlikely to result in high risk to the rights and freedoms of data subjects. When communicating a breach to the supervisory authority, the following information must be included:

- The nature of the breach;
- Categories and approximate number of data subjects and categories and approximate number of data records;
- Affix communication to affected individuals;
- The name and contact details of the DPO, where more information can be obtained;
- The consequences, potential and realised, of the breach;
- The measures taken or proposed to be taken by the controller to address the breach.

The DPO will keep a breach register for the school. The full breach log will be shared with the Board of Directors on an annual basis.

However, the Board of Directors will be notified at the earliest opportunity of any breaches which are assessed as being reportable to the supervisory authority.

## **MONITORING AND REVIEW**

Verita will monitor the implementation of the policy and check annually that the school has registered with the appropriate Government body.

The Principal and the DPO will monitor the effectiveness of the policy and will report to the Governing Body at least annually.

Verita will review this policy at least every two years and assess its implementation and effectiveness. The policy will be promoted and implemented throughout the school.





Created and Reviewed by: Damian Ward/Verita Founder and Advisory Board  
Policy Category: Health and Safety  
Approved by Michael Wolper  
Next Review: January 2023

