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Privacy statements students and parents

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Introduction

Everyone has the right to privacy, and as such, personal data should be adequately protected. The Katholieke Scholenstichting Utrecht (KSU), as an educational institution, processes personal data of both you and the students, and we attach great importance to protecting this information. We handle personal data with the utmost care, adhering strictly to legal regulations. You can trust that the data of both you and the students are secure with us. KSU offers students a safe learning environment, also in terms of privacy.

This privacy statement aims to inform you about how we handle the personal data of both you and the students. Among other things, you can learn about the purposes for which we collect and use personal data, the legal basis for such processing, the specific personal data we process, and our secure handling of this information. Additionally, you will find information on how long we retain the data and what rights you have.

Why do we process your child's data?

Purposes and legal basis for processing

We process personal data of students to fulfill our obligations as an educational institution, primarily for organizing and providing education and guidance. We process data when there is a lawful basis for doing so.

Legal obligation

Most of our processing activities are based **on legal obligations**, serving the following purposes:

- Enrolling the student in our school for admission and placement.
- Providing education and guidance.
- Maintaining records of progress and results.
- Offering advice on education based on progress.
- Keeping you informed about the development.
- For the transition of your child from our school to another educational institution.

- The calculation, documentation, and collection of school fees, as well as contributions or fees for educational materials and extracurricular activities.
- For extracurricular activities such as school trips and parent activities.
- To address inquiries and handle any complaints.
- To provide students with an appropriate and safe learning environment, both physically and digitally.
- In support of the registration of attendance and absences in compliance with compulsory education regulations.

Legitimate Interest

Furthermore, we process student data based **on legitimate interest**. The purpose of this processing is to benefit the student/parents. Ensuring good security and minimal data processing are important to us.

Objectives:

- Providing education using digital learning resources and (digital) educational materials aligned with the educational vision.
- Internal and external communication of and about the school, such as the school guide or a newsletter.
- Collection of parental contributions.
- Monitoring the reliability, integrity, and availability of data.

Consent

Data may also be processed based on **consent**, with the following objectives:

- Informing parents and students through visual materials about activities and developments on and around the school and/or educational activities (visual material on websites, school guide, newsletter).
- Providing special guidance or arranging special accommodations in connection with a student's health condition (registering health data only at the request of parents/guardians).

You have the right to withdraw your consent at any time.

Any further processing of personal data for a purpose other than the one for which the data were collected will not occur without informing you first and, if necessary, obtaining your consent.

What data do we process?

Personal data

We process various personal data, of which a portion is directly received from you or your child. These details are provided during enrollment, intake, and the signing of agreements. This may include:

- Name, date of birth, Social Security number, contact information.

A portion of the personal data we process is collected by us, such as:

- Progress data of students
- Information about the nature and progress of education and support, as well as the achieved academic results
- Internet data and user rights data

Data that we have not received from the student (or parent(s) and/or guardian(s)) and have not collected ourselves have been obtained (when applicable) from the following sources:

- Previous school of your child

- Healthcare providers to whom you have granted permission to inform the school

Special Personal Data (such as health information, religious beliefs)

The school may process health data of students when necessary for providing special guidance a student may require or for implementing special arrangements related to a student's health condition (Art. 30 2.a UAVG). It may also occur that health data is processed to respond effectively in emergency situations.

In all other cases, the processing of special personal data only occurs with your explicit consent.

For a more comprehensive overview of the processed personal data, we refer you to Annex 1.

Which parties do we exchange data with?

Third parties

In certain instances, we share personal data with other data controllers (third parties), with the most common being:

DUO (Dienst Uitvoering Onderwijs), truancy officer, GGD (Gemeentelijke Gezondheidsdienst), the education inspection, Centrum Jeugd en Gezin, accountant, the collaborative association for inclusive education in Utrecht (SWV Utrecht PO).

We share data with third parties only when there is a legal basis for doing so, either to comply with a legal obligation, for the performance of a contract, for the exercise of a task carried out in the public interest, or due to a legitimate interest. In other cases, your consent will be sought. We only share the data that is necessary for the specific purpose.

Data processors

We may engage (commercial) entities to assist in processing data. The primary processors for KSU are the providers of digital education systems, teaching methods, educational materials, and assessments. Additionally, KSU utilizes processors for (student) administration purposes.

This processing always takes place on behalf of and under the responsibility of KSU. Agreements are established with these processors, outlining, among other things, the types of data processed, the duration of processing and retention, and the security measures in place.

When we share personal data, these data will not be processed outside the European Economic Area unless:

- Additional agreements have been made, or
- Measures have been implemented to ensure the privacy of you and your child is safeguarded.

What security measures do we take?

KSU implements appropriate measures to prevent abuse, loss, unauthorized access, and other unwanted actions with personal data. We store personal data in systems with limited access and utilize encryption. The following measures have been implemented:

- Adequate policies for securing the processing of personal data, with periodic evaluation and, if necessary, adjustments to the policy.
- Only authorized personnel can access the personal data necessary for their tasks.
- Access to systems is secured through a password policy that aligns with current technological standards.

- Various measures have been taken to protect personal data from processing risks, especially due to the destruction, loss, alteration, or unauthorized disclosure or access to transmitted, stored, or otherwise processed data, whether accidental or unlawful.
- Measures have been implemented to identify vulnerabilities in the processing of personal data in systems used for providing services to the educational institution.
- There is a protocol outlining how to respond in case of security incidents.

If, unexpectedly, something happens to your personal data resulting in personal damage, we will inform you immediately.

Which retention periods do we use?

Collected personal data is not retained longer than necessary for processing. The determination of the retention period depends on the purpose for which KSU collected the data and any legal obligations to retain data for a specific duration.

Most data processed by the school is destroyed 2 years after the student has been deregistered. Different periods apply to data in the student administration and, in the case of transferring to another school, the educational report (5 years). Financial and tax data, as well as funding documents, are retained for 7 years after leaving the school.

What are your rights?

Parents or guardians of students under 16 years old have certain rights regarding personal data, as established by law. These rights can be exercised at any time.

Right to access, correction, erasure, and restriction of processing

As the data subject, you can always request access to the data we process about your child(ren). You have the right to supplement or correct inaccurate data. We will ensure that these corrections are also made with organizations with whom we share and/or exchange this information.

If you request us to limit the processing of your child's data or to erase data, we will assess whether this is possible. In this assessment, we adhere to legal regulations and determine whether there is a legal obligation to retain the data.

Right to data portability

You also have the right to transfer the data we process about your child, as well as data we have received from you, to yourself or, upon your request, to another organization.

Right to object

You have the right to object to the processing of personal data in specific situations. This does not apply to general or fundamental objections. In most cases, a balancing of interests will need to be conducted.

Right to object to automated decision-making and profiling

Sometimes, personal data is processed automatically, and decisions are made based on that processing. As a parent, you have the right to refuse this in the interest of your child. The school does not employ automated decision-making that has legal consequences for the individuals involved or significantly affects them (i.e., decision-making without human intervention with significant consequences for the individual, such as the automatic rejection of job applicants).

Right to file a complaint with the AP (Dutch Data Protection Authority)

If you have questions about how we handle your child's data, you can contact the teacher or the school principal. You can also reach out to our privacy contact person at secretariaat@ksu.nl.

For questions and/or complaints regarding personal data, you may contact the Data Protection Officer (FG). The officer can be approached by you in confidence, and the information will not be shared with the school leadership without your consent. See the contact details below.

If, unfortunately, you are unable to resolve the issue with us, you have the right to file a complaint with the Dutch Data Protection Authority: (www.autoriteitpersoonsgegevens.nl).

How can I exercise my rights?

If you wish to exercise the rights described above, the following procedure applies:

- You can submit your request digitally, in writing, or verbally to the school principal.
- Only the legal representatives of a student are authorized to submit a request. The identity of the requester must be clear. Therefore, KSU may request a valid ID for verification of your identity.
- KSU will provide a response to your request within one month of its submission. KSU may, with a stated reason, inform you that more time is required and extend this period by a maximum of two months.

Privacy Statement Version

Last Modified on 15-11-2023

We reserve the right to modify this privacy statement. Any revised versions will be posted on the website. When a revised version is published, we will provide a clear notification with information about the key changes. Additionally, we will indicate the date of the last modification of the statement.

Appendix 1: More information about the personal data we process

Category	Explanation
Contact details for student and parents/guardian	name, gender, date of birth, address, email address, telephone number .and similar data required for communication
Student number	an administration number that identifies educational participants.
Nationality and place of birth	
Medical data	data that is necessary with a view to the health or well-being of the student insofar as these are important when taking additional measures to ensure proper education (e.g. extra time for tests); or at your own request.
Student progress	data regarding the nature and course of education, as well as the progress and results achieved; to know: <ul style="list-style-type: none"> • Advice from primary school for further education • Result data (Citoscore) • Educational guidance data • Data regarding attendance (attendance registration) • Care guidance data/(health data.) • Class, grade, education type or method.
Educational organization	data for the purpose of organizing education and providing or making learning materials available.
Finances	data for the purpose of calculating, recording and collecting registration fees, school and tuition fees and contributions or reimbursements for learning materials and extracurricular activities, as well as the bank account number of the parents;
Imagery	photos and video images (with or without sound) of school activities or for identification purposes.
BSN/PGN	The student's BSN number must be recorded upon registration. The school calls this number the personal number (PGN).
Chain ID (ECK ID)	unique ID for the 'educational content chain'. This allows educational institutions to share data without it being directly traceable to students.
Internet data	IP address, online surfing behavior, cookies, diagnostic data (log and monitor data, metadata).
User rights information	Rights per user and how those rights are used (logging/log files).

