

Privacy Policy

The categories of parent information we process include:

- Personal identifiers, contacts and characteristics (such as name, contact details, address and place of work)
- Sensitive characteristics (such as nationality and language fluency)
- Safeguarding information (such as court orders)
- Relationship links (relationship to pupils)
- Communications (such as records of meeting with parents and internal communications and records of meetings)
- Photography and videography (such as CCTV, marketing imagery and imagery used to allow us to communicate more effectively with parents)

Why we collect and use parent information

The personal data collected is essential, in order to provide our pupils with an education, to carry out our contractual obligations to parents, to meet legal requirements, to report on the progress and behavior of pupils, to keep the children in our care safe and to perform the public tasks required of all schools in Romania. We also collect and use some data for marketing purposes and for promoting the activities of our school.

We collect and use parent information, for the following purposes:

- a) to carry meet our contractual obligations to parents
- b) to support pupil learning
- c) to report on pupil attainment progress
- d) to provide appropriate pastoral care
- e) to assess the quality of our services
- f) to keep children safe
- g) for the detection and prevention of crime (CCTV)
- h) to promote the activities of our school
- i) to promote different events that might present interest to parents

Under the EU General Data Protection Regulation (GDPR), the lawful basis we rely on for processing pupil information are:

- for the purposes of (a) in accordance with the legal basis of contract: to allow us to meet the contractual obligations we have with parents.
- for the purposes of (b), (c), (d) and (e) in accordance with the legal basis of legitimate interest: collecting the data necessary for us to be able to provide our pupils with an

education in accordance with the contracts we have with parents

- for the purposes of (f) and (g) in accordance with the legal basis of vital interest: to keep children safe (food allergies, medical conditions, safeguarding)
- for the purposes of (h) in accordance with the legal basis of consent: we will collect consent to perform marketing and promotional activities at the time of collection. Such consent may be withdrawn at any time using the various mechanisms made available to do so or by contacting the data protection officer identified at the end of this privacy policy.

In addition, concerning any special category data:

- conditions a, b, c and d of [EU GDPR Article 9](#)

Collecting parent information

We obtain parent information via registration forms and contracts before the start of each academic year and through updates provided by parents using our parent portal. CCTV data is obtained through our use of CCTV to monitor the activities of visitors to our school. Photographs and videos may be obtained during school functions and events.

Parent data is essential for the schools' operational use. Whilst the majority of parent information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with GDPR we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

Storing parent data

We hold data securely for the set amount of time shown in our data retention schedule. For more information regarding our data retention schedule and how we keep your data safe, please visit www.transylvania-college.ro/school-life/important-information-for-parents.

Who we share information with

We routinely share parent information with:

- Penta International
- iStyle
- Google
- Education Software Services Ltd (ESS)
- Securely Inc CA, USA
- Social Media
- Wellbeing Institute

Why we routinely share pupil information

Penta International

Penta carries out inspections on the school's behalf as part of the accreditation process for the British Schools Overseas (BSO) and Council of British International Schools (COBIS) accreditation programs.

We share data, such as pupil and parent surveys, to allow them to monitor and assess our school against the BSO and COBIS criteria for accreditation. This data is shared with them during on-site visits as a mixture of both electronic and paper records. They use this data to produce an inspection report which is then publicly published on their website (<http://www.pentainternational.co.uk/bs0.php>) the inspection report may contain anonymised statistical data but does not contain data from which individual parents or their children could be identified.

Social Media

We use social media to publicize the activities of the school which includes photographs and videos which may include pupils, parents and staff. We ask for consent to do this and that consent can be revoked at any time by contacting our data protection officer, named at the end of this policy. We currently use Facebook, Instagram, Twitter, Youtube, Flickr, Pinterest and Google platforms for this.

iStyle

We have partnered with iStyle as part of our iPads for Learning project. They are our recommended supplier of iPads to parents, pupils and staff. In order to facilitate the ordering and distribution of iPads we share the names and contact details of pupils and parents who have requested that we reserve an iPad for them with iStyle. They use this information in order to be able to keep them updated about the progress of their order and to allow them to identify customers who are entitled to the discount we have negotiated with them, which is exclusive to members of our school community. The data is shared only with the store manager and is not used for marketing or promotional purposes. We only share the data of pupils and parents who have asked us to do so in order for them to be able to reserve an iPad from iStyle.

We share this data with them as a secure, encrypted document stored online with Google

Drive. Google

We make use of the Google Apps for Education tools provided by Google Education, including Mail, Drive, Docs and Classroom. Mail is used by staff to communicate with each other and with pupils and parents regarding student progress, behavior, additional needs and concerns. Copies of correspondence with parents are retained in Google Mail by the individual staff concerned.

Education Software Services Ltd (ESS)

Our Management Information System (MIS) and parent portal are provided by Education Software Services Ltd (ESS), collectively known as SIMS. SIMS is the primary storage location for our database of pupil, parent and staff data. It is hosted securely by Education Software Services Ltd (ESS) and accessed by us remotely. Access to certain data held within SIMS is available to parents and students through Epraise by accessing the online portal:

<https://www.epraise.co.uk/>

Wellbeing Institute

The Wellbeing Institute is a non-profit organization whose mission is to transform schools through the programs they carry out. The programs, courses and events conducted by the Wellbeing Institute are addressed to teachers and parents, adolescents and schools. A partnership was established between the Wellbeing Institute Association and Transylvania College based on constant communication, with the aim of strengthening the knowledge of teachers and parents who are part of the school community of Transylvania College. Based on the partnership, Transylvania College provides the Wellbeing Institute with personal data of teachers and parents from the Transylvania College community who are or may be interested in courses and events conducted by the Wellbeing Institute, to whom invitations to courses, events will be sent organized by the Wellbeing Institute Association.

The purpose of the processing covered by this Agreement is to fulfill the partnership established between the Wellbeing Institute Association and Transylvania College, respectively to strengthen the knowledge of teachers and parents who are part of the school community of Transylvania College through courses and events organized by the Wellbeing Institute .

Requesting access to your personal data

Under GDPR, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the data protection officer identified at the end of this privacy policy.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ANSPDCP, or through the courts

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal (ANSPDCP) at <http://www.dataprotection.ro/?page=contact&lang=ro>

Contact

If you would like to discuss anything in this privacy policy, please contact our data protection officer (DPO):

- Adriana Todea on 0722 647 208 or by email at dpo@transylvania-college.ro