



Privacy Statement

1. Introduction

- 1.1 Downe House Riyadh (“**Downe House Riyadh**” or “**we**”) acknowledges the importance of the privacy of its pupils and their families, employees, contractors, and visitors.
- 1.2 This Privacy Policy sets out important information regarding Downe House Riyadh’s collection and use of personal information, the rights of the individuals whose data is collected, as well as the terms and conditions applicable to the use of our website. We will collectively refer to all the personal information/data we collect, in whatever form, as “Personal Data”.
- 1.3 Because of the constantly evolving nature of the Internet, new technologies and our social and legal environment, we may be required, from time to time, to update this Privacy Policy. Any such updates or changes to this Privacy Policy will be posted on this page.
- 1.4 By using our website (student/parent portal), admissions portal, or otherwise providing us with your Personal Data for the provision of educational services or other social activities while enrolled in the school, you acknowledge having read the terms of this Privacy Policy and consent to its terms and to its collecting and processing your Personal Data accordingly.

2. Scope

- 2.1 This Policy applies to the collection and processing of the Personal Data (as applicable) of prospective and existing pupils, their parents, Downe House Riyadh employees, visitors, and contractors in regard to the school.

3. Your Personal Data

- 3.1 What and why?

3.1.1 The Personal Data we collect varies depending on the relevant transaction/service (admission application, website use, social events) and may include names, residence/ID card and passport details, gender, relevant medical information (allergies, vaccination records, ongoing medication), photographs, videos, potentially biometric data and other identifiable information, together with any other information we may require to process your request, provide the relevant service and/or generally ensure the proper administration of the school. This Personal Data may relate to the student, their parents, Downe House Riyadh employees, visitors, contractors and/or others in relation to Downe House Riyadh.

3.1.2 We may collect your Personal Data for the following (non-comprehensive) purposes:

- Evaluating your eligibility for admission;
- Assessing/appraising our process for evaluating applicants for admission into Downe House Riyadh. It is in our legitimate interest as an educational institution to understand and improve our processes;
- Managing your records;
- Processing any financial transaction with you;
- Providing you with information regarding Downe House Riyadh events and initiatives. We will generally only do this where it is in our legitimate interest and where you have not objected or withdrawn any prior consent given;
- Processing and dealing with any complaints or enquiries made by you or legally on your behalf;
- Providing educational, health or other services at Downe House Riyadh;
- Operating any website or portal relating to Downe House Riyadh;
- Participation in any social activities while enrolled at Downe House Riyadh, which may include photos, videos, images, and postings.

3.1.3 Other uses of personal data will be made in accordance with Downe House Riyadh's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

3.1.4 In addition, the school may need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

3.2 How do we use your Personal Data?

- 3.2.1 The Personal Data we collect will be used only for the purpose stated in this Privacy Policy. To achieve such purpose, we may, from time to time, disclose Personal Data to Downe House Riyadh employees, consultants, contractors and agents who have a legitimate need to know and are bound to apply the same standards of confidentiality and security that Downe House Riyadh abides by.
- 3.2.2 We may also need to share your Personal Data, as required, to respond to lawful requests and legal process; to protect our rights and property and those of our pupils, agents and others, including to enforce our agreements and policies; and in an emergency, to protect Downe House Riyadh and the safety of our pupils, department and staff or any third party.
- 3.2.3 We may also, at our discretion, share images of the student, their parent or other visitors to the school for use within the school, within the school community via our online portals, or otherwise publicly, including through school newsletters, print, television, streaming video or other social media.
- 3.2.4 If you have any concerns or objections to this, please contact us at the email address below.
- 3.2.5 Downe House Riyadh may also request explicit consent in order to:
- Send electronic marketing communication relating to prospective parent events and Downe House Riyadh news;
 - To share data with assigned guardians acting in loco parentis; and
 - Conduct checks of financial circumstances in support of a bursary.
- 3.3 Downe House Riyadh expects that the following uses will be necessary in order to fulfil the terms of our contracts with pupils, parents and guardians, and may fall within the category of its (or its community's) "legitimate interests":
- 3.3.1 To provide in-person and remote learning education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils;
- 3.3.2 To regularly monitor pupils' progress and educational needs, in conjunction with nationally recognised third-party providers. Data shared may be subsequently used by these providers for further research purposes (following the anonymisation of the data sets) and development of educational policy. Further information will be provided on request.
- 3.3.3 To employ the use of third-party services to provide parents with the opportunity to discuss pupil progress remotely on at least an annual basis;

- 3.3.4 For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- 3.3.5 To enable relevant authorities to monitor Downe House Riyadh's performance and to intervene or assist with incidents as appropriate;
- 3.3.6 To enable pupils to take part in national or other assessments, which involves sharing personal data for moderation purposes, and to publish the results of public examinations or other achievements of pupils of Downe House Riyadh
- 3.3.7 To safeguard pupils' welfare and provide appropriate pastoral care;
- 3.3.8 To share data with assigned guardians acting in loco parentis;
- 3.3.9 To monitor (as appropriate) use of Downe House Riyadh's IT and communications systems in accordance with Downe House Riyadh's ICT Acceptable Use policy;
- 3.3.10 For security purposes, including CCTV in accordance with Downe House Riyadh's CCTV policy;
- 3.3.11 Where otherwise reasonably necessary for Downe House Riyadh's purposes, including to obtain appropriate professional advice and insurance for the school.
- 3.4 Downe House Riyadh will also request explicit consent in order:
 - 3.4.1 To give and receive information and references about current pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend, and to provide references to potential employers of past pupils;
 - 3.4.2 To sign pupils up to trusted online learning resources and tools, to support their learning, revision technique and delivery of course and homework;
 - 3.4.3 To share contact details with Friends of Downe House Riyadh, a parent-run association providing support and activities for prospective and current families, opportunities to attend events;
 - 3.4.4 To make use of images of pupils (photography and film) in Downe House Riyadh publications, on our website and (where appropriate) via our social media channels in accordance with our procedures regarding taking, storing and using images of children.

3.6 In addition, Downe House Riyadh may need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

These reasons may include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example, for medical advice, social services, insurance purposes or to organisers of Downe House Riyadh trips.
- To provide a range of health services via our Medical Centre to registered pupils, and to share information between practices (where necessary) if a pupil, member of staff or visitor to Downe House Riyadh is registered elsewhere.
- To provide educational services in the context of any special educational needs of a pupil and, where appropriate, to share special category personal data with members of staff and third parties if in the best interest of the pupil.
- To run any systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc.).
- For legal and regulatory purposes (for example, child protection, diversity monitoring and health & safety) and to comply with its legal obligations and duties of care.

4 COVID-19 Responsibilities

4.1 The school has a legal duty to protect and promote the welfare of pupils and a duty of care to staff.

4.2 Our Medical Centre is bound by the regulations of the Ministry of Health, which requires registered medical practitioners to report notifiable diseases, including COVID-19.

4.3 As more pupils are returning to our schools, the safety and wellbeing of pupils, staff and their families is a priority.

- 4.4 As a private individual, compliance with the Covid 19 regulations is mandatory and in accordance with the law.
- 4.5 If a person in our schools has COVID-19 or symptoms of the virus then we will follow our policies and procedures to prevent transmission throughout our community.
- 4.6 In a school setting, it would be most unusual for any one person to know the details of everyone else who may be affected. It is only the school that will have that data.
- 4.7 We would notify individuals about a risk, and in many instances that will be sufficient.
- 4.8 The school will follow the guidance of the Ministry of Health and the Ministry of Education.
- 4.9 As a school we will co-operate with such requests, and it may be necessary for us to share the data. Although at no point will we share data without a sound legal basis, please be aware that we will share data where necessary and it is likely that we will be asked to provide contact details if a case or suspected case of coronavirus arises in our school.
- 4.10 Data (e.g. name, contact details, attendance information, etc.) will be shared on the basis that it is in our "legitimate interest". This basis recognises that sharing the data is likely to be in the interests of the individual, the organisation, and public health efforts to tackle COVID-19, as long as individuals' rights are protected, and data protection principles are followed.
- 4.11 Where it is necessary to share special category data (including relevant medical information) the school will rely on the basis that to do so is "necessary for reasons of public interest in the area of public health, such as protection against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare"
- 4.12 Please be assured that we will keep a record of information that we share.
- 4.12 The school is committed to maintaining the privacy of individuals and will not share the names or details of people with coronavirus (COVID-19) unless essential to protect others.

4.2 Responsibilities: Parents, Guardians & Staff

The school must ensure that staff members and parents / guardians understand that they must be ready and willing to: -

- 4.2.1 Book a test if they or their child are displaying symptoms of coronavirus.
- 4.2.2 Provide details of anyone they or their child have been in close contact with if they were to test positive for coronavirus.
- 4.2.3 Self-isolate if they have been in close contact with someone who tests positive for coronavirus (COVID-19), or if anyone in their household develops symptoms of coronavirus (COVID-19).
- 4.2.4 Parents and staff are requested to inform the school immediately of the results of a test, negative or positive, to support our effective management of confirmed cases amongst the school community alongside Ministry of Health requirements.

5 Who Has Access to Personal Data and Who Downe House Riyadh Shares It With

5.1 Data available within Downe House Riyadh will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis) and, occasionally, with the President and members of Board.

Particularly strict rules of access apply in the context of:

- Medical records which are held and accessed only by medical staff.
- Special educational needs files; and
- Pastoral or safeguarding files.

5.2 However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires. Staff, pupils and parents are reminded that Downe House Riyadh is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities or the police. Further information about this can be found within our Safeguarding (Child Protection) Policy.

5.3 Occasionally, Downe House Riyadh will need to share personal information relating to its community with third parties, such as professional advisers (lawyers or accountants) or relevant authorities including the police.

5.4 Downe House Riyadh may also share personal data with third parties who provide academic support (i.e. for teaching practices or testing and homework practice for pupils), with examination boards (i.e. when submitting grades and processing access arrangement applications), and professionals who specialise in

support for Special Educational Needs, English as an Additional Language (EAL) and health.

5.5 For the most part, collected personal data will remain within the school. However, some personal data may be transferred beyond the school. This may be necessary for a range of reasons; for example, to communicate effectively with a pupil's parents, to provide a reference to an overseas educational institution, to access an online educational resource (subject to explicit consent provided by or on behalf of the pupil), or due to another legal obligation.

5.6 In accordance with applicable Data Protection Law, some of Downe House Riyadh's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with Downe House Riyadh's specific directions.

6 System Information, IP Addresses

6.1 Downe House Riyadh may record the numerical Internet Protocol (IP) address of the computer you are using, information about your browser and operating system, date and time of access and the internet address and page which linked you to our site. Downe House Riyadh IT personnel uses such information to help diagnose problems with our server, to administer and improve our website.

6.2 Downe House Riyadh ordinarily does not disclose site usage by individual IP addresses to third parties, but we may do so in very limited circumstances such as compliance with applicable laws and/or court order(s), working with consultants assisting us in fixing or improving our site, or in monitoring and improving the security of our network.

7. Cookies

7.1 Cookies are small text files placed on your computer or mobile device by our site and automatically collect some information that you do not provide directly.]

7.2 We use them in order (i) to make our site work, or work more efficiently and be more user friendly, and (ii) to obtain data for statistical purposes on the use of the site (e.g. to find out what pages are visited and how often). If you use our site, whether as a registered user or not, we may use cookies also to enhance your experience on the site and to provide certain services that require the identification of the user's path through the navigation pages.

7.3 Downe House Riyadh may use cookies to deliver customisable and personalised services and information by tracking which pages a user has already visited. We may also use cookies to track session information, such

as pages visited or duration of visit, which will help us continue to improve our format and content.

- 7.4 You may set your browser to refuse or block cookies; in which case some portions of our site may not operate properly if cookies are disabled.

8. Security

- 9.1 Downe House Riyadh is committed to protecting your privacy and the security of the information you share with us. We take adapted physical, administrative, and technical measures to safeguard your Personal Data in accordance with any applicable local Personal Data and Privacy Protection Law ("**PDP Law**").
- 9.2 However, despite our best efforts to protect your personal information, including reviewing our security procedures against new technology, no security measures (including security related to the Internet data transmission or storage) can be guaranteed to be infallible from unauthorised access. As a result, Downe House Riyadh cannot ensure or warrant the security of any information provided to us. By using our site and submitting your Personal Data you acknowledge doing so at your own risk.
- 9.3 In the event where any breach in the security of your Personal Data should be identified, we would inform you in accordance and subject to the country's PDP Law.

9. Your rights

- 9.1 To the extent permissible under the country's applicable PDP Law, you have the right to request correction, objection and/or deletion of your Personal Data at any time by contacting Downe House Riyadh at info@downehouseriyadh.com

10. How Long We Keep Data

- 10.1 Downe House Riyadh will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff personal files and the pupil educational record is up to 7 years following departure from the school (assuming the age of the pupil on departure in 18). However, incident reports, special educational needs files and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.
- 10.2 Moreover, the school may retain some personal data relating to pupils and members of staff for archiving purposes (including historical research) to

preserve and commemorate the school’s community and heritage. The school will operate within any archive laws applicable to the country.

11. Questions, Concerns, Claims

- 11.1 For any questions, concerns, suggestions you may reach us at info@downehouseriyadh.com

12. Policy History

Date of adoption of this policy	August 2022
Date of last review of this policy	August 2022
Date for next review of this policy	June 2023
Policy owner (SLT)	Head of School
Policy owner (Board)	Chair of the Board