Privacy Notice for Parents and Child(ren) - How We Use Your Data

Introduction

Further to your adherence to ECiM's Data Protection And Use Of Images document, and thereby your consent to our processing of your personal data and that of your child who is a pupil with us ("your child"), this notice is to help you understand **how** and **why** we collect the personal data and **what** we do with it. It also explains the decisions that you can make about your own data.

If you have any questions about this notice please contact the **Bursar**.

What is personal data?

Personal data is data that identifies a person as an individual and relates to that person.

This includes, but is not limited to, a person's contact details, personal status (including a person's gender identity), nationality, religion, ethnicity, next of kin, medical data (including information about the person's physical or mental health or condition) and financial data. CCTV, photos and video recordings are also personal data.

How and why does the College collect and use personal data?

We set out below examples (this is not exhaustive) of the different ways in which we use your child and your personal data and where this personal data comes from. The College's primary reason for using this personal data is to provide educational services for your child.

- We obtain data from the various forms that have been filled, the documents that have been provided to us and other available sources.

- We will require data about any relevant family circumstances which might affect your child's welfare or happiness.

- We may use your car details (arising from your use of our car parking facilities).

- We will require data about any relevant court orders or criminal proceedings which relate to you and/or your child. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the College, and also comply with any applicable laws.

- We use CCTV to make sure the school site is safe. CCTV is not used in private areas such as toilets.

- We may take photographs or videos of you and/or your child at College events to use on social media and on the College website. This is to show prospective parents and pupils what we do here and to advertise the College. We may continue to use these photographs and videos after your child has left the College.

- We will use the contact details of parents, alumni and other members of the College community to keep them updated about the activities of the College, including by sending updates and newsletters, by email and/or by social media platforms and/or by post. The College may also:

  - Contact you in order to promote and raise funds for the College;

  - Collect data from publicly available sources about parents' and former pupils' activities, in order to maximise the College's fundraising potential and to ensure that the College can invite parents and former pupils to events relevant to their circumstances;

  Should you wish to limit or object to any such use, or would like further information about this, please contact the Bursar in writing.

- We may use data about you and/or your child if we need this for historical research purposes or for statistical purposes.

Medical Data (including information about the person's physical or mental health or condition)

We may use medical data provided to us by you or your child's doctor, to ensure that your child's medical needs are well supported. Medical data is kept confidential to the College Medical Centre and those with particular responsibility for your child's welfare, such as their Housemaster/mistress, Head of Prep School. Information on pupil allergies will be shared with all staff to ensure the safety of all pupils.

Financial data

- We will process financial data about you, and/or your child if relevant, in relation to the payment of fees and other financial matters. In some cases, we get data about you from third parties such as credit reference agencies and other available sources.

- We may retain, store and hold financial data about you in all aspects, including data about any bankruptcy petitions and statutory demands etc.

- We may engage with any credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees.

    - The credit reference agency will keep a record of that search and details about your application.

    - This record will be seen by other organisations which make searches about you.

- Failure to supply data may result in rejection of your application to enroll your child, a refusal of an award or credit etc.

Sharing personal data with third parties

- In accordance with our legal obligations, we will share data with governmental, federal and state, agencies, including, but not limited to, the Ministry of Education, the Inland Revenue Department and Customs & Excise etc.

- Also, in accordance with our obligations under the law, we will share data with the police and/or other local enforcement agencies.

- We will share data with our legal advisers for the purpose of obtaining legal advice and/or taking legal action.

- Occasionally we may use consultants, experts and other advisors to assist the College in fulfilling its obligations and to help run the College properly, and we will share you and/or your child's data with them if this is relevant to their work.

- On a yearly basis, our statutory auditors and tax consultants would have access to our financial and other records as part of their statutory work. We may have to provide data about you and/or your child, if requested by them as part of their work.

- If your child is not of Malaysian nationality, we have to make sure that your child has the right to study in Malaysia. We will have to provide data about you and/or your child to the Ministry of Education for a support letter application and the Malaysian Immigration Department or such other relevant government agency, for the purpose of student visa or guardian visa application.

- We will share your data with our insurance company, where relevant.

- If at any time there are fees past due, we may share such data about this, upon their enquiry, if any, with other schools or educational establishments and lawyers for debt recovery work.
- If your child leaves us to attend another school we may need to provide that school with all data about you and/or your child.

- We may share data about you and/or your child with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations, or in connection with school fees.

- We will need to share data if there is an emergency, for example, if your child is hurt whilst on College premises, and we shall do so at our sole and absolute discretion, for the safety and wellbeing of your child.

- We sometimes use contractors to handle personal data on our behalf. The following are examples:

    - IT consultants who might access data about you and/or your child when checking the security of our IT network; and
    - We use third party "cloud computing" services to store some data rather than the data being stored on hard drives located on the College site.

You can withdraw your consent at any time, except where there is a statutory or legal obligation on our part to disclose such data. Any use of you and/or your child's data before you withdraw your consent remains valid. Please write to the Bursar in clear and precise terms if you would like to withdraw any consent given.

For how long do we keep your data?

We keep you and/or your child's data for as long as we need to in order to educate and look after your child. We will keep some data after your child has left the College, for contractual purposes.

In exceptional circumstances, we may keep you and/or your child's data for a longer time than usual but we would only do so if we had good reason to and only if we are allowed to do so under applicable personal data protection law.

We can keep data about you and/or your child for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the data might be useful if someone wanted to write a book about the College.

The table below shows for how long we keep different types of your and/or your child's data:

Type of data	**Retention period or the criteria used to determine the retention period**
Contact details included within pupil files	Kept indefinitely in line with current best practice
Financial records	Seven years
Contact details for past pupils and parents	Kept indefinitely

Further information and guidance

The Bursar is the person responsible at the College for managing how we look after personal data and deciding how it is shared.

Like other organisations we need to keep you and/or your child's data safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the data we get fairly.

This Notice is to explain how we use you and/or your child's personal data. The Bursar can answer any questions which you may have.

Please write to the Bursar if:

- you object to us using your data for marketing purposes; or
- you would like us to update the data we hold about you; or
- you would prefer (please provide reasons) that certain data is kept confidential.