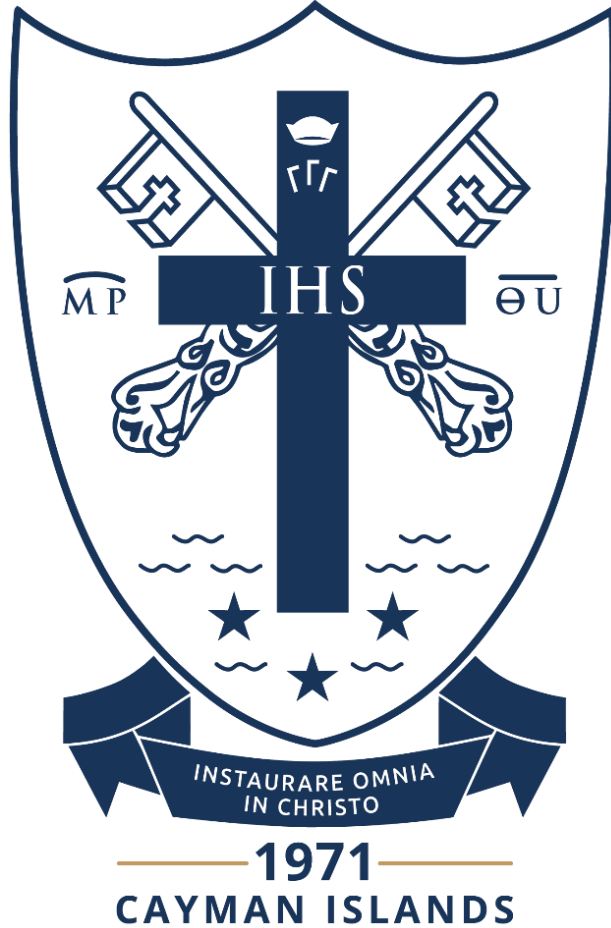


# St Ignatius Catholic School



## Privacy Notice

### Appendix 6 of Data Protection Policy

<b>Date approved:</b>	October 2023
<b>Review Date:</b>	October 2024
<b>Responsible for Review:</b>	Data Protection Officer

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## Overview

St Ignatius Catholic School (St Ignatius) is committed to being a responsible custodian of the information you provide to us and the information we collect as a data controller and to using the personal data we hold in accordance with applicable laws.

This privacy notice (Notice) sets out how St Ignatius as a data controller may collect, use, and share information and describes:

- The types of information, including personal data, we may collect;
- How we may use and share the information we collect;
- The legal grounds for using personal data;
- Retention of the information we collect;
- Third party services and content
- Your choices and rights in respect of the information we hold;
- Parental consent;
- Keeping in touch;
- How to contact us; and
- Changes to this Notice.

Please read this Notice carefully. If you have questions regarding your personal data or its use, please contact [dataprotection@st-ignatius.com](mailto:dataprotection@st-ignatius.com) or alternatively via one of the channels set out in section 8 below.

## 1. The Types of information, including personal data, we may collect

We process personal data about prospective, current and past: pupils and their parents; staff, suppliers and contractors; supporters; and other individuals connected to or visiting St Ignatius.

The personal data we process may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual including:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family and next of kin details;
- admissions, academic, disciplinary, and other education related records;
- information about special educational needs, references, examination scripts and marks;
- CCTV and other images, audio and video recordings;
- financial information;
- events attended.

We also need to process sensitive personal data (which may include data concerning health, ethnicity, religion, criminal records) about some individuals including pupils and school staff. We do so in accordance with applicable law and, where necessary, by relying on individuals' explicit consent.

## 2. How we may use and share the information we collect

We collect most of the personal data we process directly from the individual concerned or, in the case of pupils, from their parents. In some cases, we collect data from third parties including

referees, previous schools or professionals or authorities working with the individual or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided, as described below. We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around the use of technology and own devices, and access to school systems.

Saint Ignatius Catholic School is owned and operated by Saint Ignatius Catholic Church. That Parish of Saint Ignatius is part of the Archdiocese of Detroit. In the course of school business, we share personal data - including sensitive personal data where appropriate - with third parties such as medical staff, professional advisors and relevant authorities (e.g. Department of Education Services, Department of Children and Family Services, Department of Labour and Pensions and the Department of Immigration).

We may also share personal data, including sensitive personal data where appropriate, with those members of the Saint Ignatius Catholic Church and the Archdiocese of Detroit who are responsible for the operation of Saint Ignatius Catholic School.

Therefore, we may transfer information to countries outside the Cayman Islands which may have data protection laws and regulations that differ. Personal data will not be transferred outside the Cayman Islands unless that personal data will be afforded an equivalent level of protection.

We may store the information we collect in on our servers both cloud-based or in servers located in secure data centres within the Cayman Islands but also in countries where we or our service providers have facilities. Some of our systems are provided by third parties. In these circumstances contractual and other technical and security safeguards will be put in place with the third-party service provider, including to ensure that personal data is processed only in accordance with this Notice.

However, no information system can be 100% secure. We cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the internet and wireless networks.

We process personal data to support our operation as a school and in particular for:

- **The selection and admission of pupils;**
- **The provision of education** to pupils including the administration of the school curriculum and timetable; monitoring pupil progress and educational needs; administration of pupils' entries to examinations, reporting upon and publishing examination results;
- **The provision of educational support to pupils and parents** including the maintenance of discipline; provision of library services; administration of sports facilities and teams, organising school field trips; provision of the school's IT and communications systems and a virtual learning environment;
- **The safeguarding of pupils' welfare**
- **Compliance with legislation and regulation**
- **Student administration** including the compilation of pupil records;
- **School administration** including the administration of invoices, fees and accounts; the management of school property; the management of security and safety arrangements including the use of CCTV and monitoring of the school's IT and communications systems;

research and statistical analysis; the administration and implementation of the school's rules and policies for pupils and staff; and other operational purposes;

- **Staff administration** including the recruitment of staff and the engagement of contractors; administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references; and
- **The promotion of St Ignatius School** through our website <https://www.st-ignatius.com/> and other communications.

### 3. The legal grounds for using personal data

We may process your personal data for the above purposes because it is necessary:

- **for the performance of a contract** (e.g. an employment contract with a member of staff) or in order to take steps at a contracting party's request prior to entering into such a contract;
- **for compliance with our legal obligations.** We may use personal data to exercise or perform any right imposed by law in connection with employment; and/or for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- **for our legitimate interests.** Our "legitimate interests" include our interests in providing the best education possible to our pupils and our interests in managing and operating the school to the highest standards;
- **to protect an individual's vital interests** for example where we have to process personal data in order to ensure that pupil receives prompt and appropriate medical attention;
- **for the establishment, exercise or defence of legal claims;**
- **for reasons of substantial public interest,** including safeguarding purposes;
- **for medical purposes,** including the provision of health care or treatment for pupils;
- **for archiving, research or statistical purposes;**
- **we have an individual's consent to do so.**

### 4. Retention of the information we collect

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

### 5. Third party services and content

Our Website may include integrated content or links to content provided by third parties (such as social media content, plug-ins and applications). Please refer to our Cookies and Tracking Technologies Notice for more information.

### 6. Your choices and rights in respect of the information we hold;

Under local law, you may have certain rights regarding your personal information that we have collected. Customers have the right to request (i) access to your personal information, (ii) rectification or erasure of personal information, (iii) restriction of processing concerning you, and (iv) objection to processing that is based upon our legitimate interests. Your ability to exercise these rights will depend on a number of factors and, in some instances, we will not be able to comply with

your request, for example because we have legitimate grounds for not doing so or where the right does not apply to the particular information, we hold on you. If you would like to discuss or exercise the rights you may have, you can contact us through the methods stated at section 8 below.

It is important that any personal information we hold about you is accurate and current. Please keep us informed if your personal information changes whilst we continue to retain such information. If you provide information for another person you will need to direct them to this Notice. We encourage you to contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate or out of date. You can also ask us to see what personal data we hold about you and to erase your personal data if it is no longer required. You may also tell us if you object to our use of your personal data.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits, which is typically 30 days but may be extended where your request is complex. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly unfounded or excessive, we may ask you to reconsider or charge a proportionate fee, but only where data protection law allows this.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any reference given or received by the school for the purposes of the education, training or employment of any individual.

## **7. Parental consent**

The rights under data protection law belong to the individual to whom the data relates. In general, we will assume that pupils' consent is not required (and that other lawful bases are more appropriate) for ordinary disclosure of pupils' personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

Where consent is required as the lawful basis for processing personal data relating to pupils (because no other lawful basis applies) we will often rely on parental consent unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and taking in to account all the relevant circumstances.

Where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the pupil or other pupils or is required by law.

Pupils can make subject access requests (or other requests to exercise individual rights under data protection law) for their own personal data, provided that they have sufficient maturity to understand the request they are making. A person with parental responsibility will generally be entitled to make a subject access request (or other requests to exercise individual rights under data protection law) on behalf of pupils, but the information in question is always considered to be the child's at law. A pupil of any age may ask a parent or other representative to make a subject access request (or other requests to exercise individual rights under data protection law) on their behalf.

Moreover, if a pupil is of sufficient maturity, their consent or authority may need to be sought by the parent making such a request.

## **8. How to contact us**

If you would like to contact us regarding this Notice, please send us an email to [dataprotection@st-ignatius.com](mailto:dataprotection@st-ignatius.com) . In each case, to ensure your query is dealt with as swiftly as possible, please include as the subject or heading line “Data Protection.”

We may also be contacted at: Data Protection Officer, St Ignatius Catholic School, P.O. Box 2638, 599 Walkers road, George Town, Cayman Islands KY1-1102.

If you believe that we have not been able to assist with your complaint or concern, you may have the right to complain to the Office of the Ombudsman in the Cayman Islands or the relevant data protection authority in your jurisdiction.

## **9. Changes to this Notice**

We will update this Notice from time to time. If we make any material changes to this Notice regarding the way we collect, use, and/or share the personal information that you have provided and we hold your email or other contact information, we will notify you by email or other communication

## **Links to Other Policies & Procedures**

Data protection Policy