



THE ENGLISH COLLEGE DUBAI

ADMISSIONS PRIVACY NOTICE

AIM: (final result we are aiming to achieve)

At The English College Dubai LLC we value the rights and freedoms of all people. This includes respecting your privacy and protecting your personal data. This Admissions Privacy Notice ("Notice") describes how we collect and use (or "process") your information during the admissions process. It also tells you how to contact us as well as outlining what rights you have with regard to your personal data that we collect during the admissions process.

GUIDELINES: (The principles/instructions/steps of the policy)

WHO ARE WE?

The English College Dubai LLC is a school located in Al Safa 1, off Sheikh Zayed Road, PO Box 11812 Dubai, United Arab Emirates. For the purposes of this Privacy Notice "we", "our" and "us" refer to The English College Dubai LLC, and "you" and "your" refers to our students, the parents of our students or any individual making admission enquiries or applying to the school.

WHAT IS PERSONAL DATA?

The term 'personal data' refers to any information which identifies you or can be used to identify a data subject when used in conjunction with other information.

The term 'data subject' describes the person about whom the personal data is about.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

The personal data we use during the admissions process takes different forms, including:

- Children's personal identifiers and contact information (such as name and address);
- Parental personal identifiers and contact information (such as name, address, phone number and email address);
- Children's date of birth;
- Children's Nationality/identity Card/passport number;
- Parents'/guardians' employer information;
- Safeguarding/child protection information;
- Photographs;
- Parents' financial information;
- Parents' nationality and passport information;

- Emergency contact information;
- Children's native language/level of English knowledge/other languages spoken;
- Information related to the year and the grade for which each child is applying;
- Attendance (such as sessions attended, number of absences, absence reasons and any previous school(s) attended);
- Assessment and attainment information;
- Behavioural information (such as exclusions and any relevant alternative provision put in place); and
- Information from previous teacher(s) references (if applicable) related to the children's social development, language and mathematical skills or other skills related to previous educational courses.

As a school, from time to time we also need to process personal data which is designated as "sensitive" or "special category" personal data in order to facilitate our school operations and activities. Such data includes personal data regarding a data subject's concerning:

- Information related to safeguarding/protection, as well as children's health. For example learning needs, disabilities or specific diseases/allergies/food intolerances that require our assistance in terms of organisational facilities and/or our educational support. We will also collect data related to immunizations (vaccinations) when we are required by law to ask for this information.
- race ethnicity; or
- religion.

HOW DO WE OBTAIN YOUR INFORMATION?

During our admissions process, we collect the personal data in large part directly from the data subject concerned (or often in the case of students, from their parents/guardians). In some cases, we collect data from third parties (for example, previous schools).

We also collect data about you when:

- you have expressed an interest in having a student attend our school;
- you have registered to attend (or have attended) one of our events.

HOW DO WE USE YOUR PERSONAL DATA?

We may use or process your personal data for the following purposes:

- (a) the selection and admission of students;
- (b) granting access to our online admissions portal
- (c) making an evaluation of students' applications, performing all the related administrative and fiscal activities required when receiving an admission;
- (d) carrying out all the necessary organisational activities, including evaluating and placing students in different classes, and checking our capability to provide the necessary support to children and parents;
- (e) to process your payments;
- (f) to support the school's tuition and fees;
- (g) Verifying of the applicant's examination results, academic records and other information;
- (h) preparing of the enrollment agreement;
- (i) facilitating visits and tours to view the school;
- (j) enabling school administration and operation after admissions;
- (k) facilitating our aptitude testing and assessment process for applicants;

- (l) ensuring compliance with school policies and legal requirements, such as to guarantee students equity in opportunities
- (m) to support students with their learning;
- (n) monitoring and reporting on student progress;
- (o) to provide appropriate care to our students;
- (p) to assess the quality of our services as a school;
- (q) to keep the students safe (e.g. food allergies or emergency contact details);
- (r) to meet our legal duties placed upon us by applicable educational regulatory authorities;
- (s) to respond to any queries, requests, or comments that you may have;
- (t) to review, develop and improve the services which we offer.

WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

We may process your personal data for the above purposes based one or more of the following legal bases:

- Performance of a contract: We process your personal data when it is necessary to fulfil a contract we have with you or to take steps at your request prior to entering into a contract.
- Legitimate business interests: We use your personal data to operate, enhance, and minimise any disruptions to the services we provide you. Additionally, we have a legitimate interest in sharing information about services, offerings, and events that we believe will be of interest to you.
- Consent: If we specifically request your consent to process your personal data for a specific purpose.
- Legal obligations and employment rights: We may process your personal data to fulfil our legal obligations or exercise our rights related to your employment.
- Compliance with legal and regulatory requirements: We process your personal data to comply with applicable legal and regulatory obligations.
- Public interest: In some cases, we may process your personal data when it is necessary for reasons of public interest, such as equal opportunities monitoring.

WITH WHOM DO WE SHARE YOUR DATA?

In the course of school operations, we may transfer personal data (including special category data where appropriate) gathered during the admissions process with third parties. Specifically, we may share such data with:

- Examination boards;
- Colleges/Universities;
- Other educational institutions such as schools that the students attend after leaving us;
- Third party service providers and subcontractors who provide a service to us (including but not limited to marketing, data processing, IT and office services);
- The school's professional advisors; and
- Relevant authorities such as the Ministry of Education, Dubai Health Authority and the Dubai Knowledge and Human Development Authority (if legally required to do so).

We may also be required to share your personal data with other organisations for legal or statutory purposes, or where we have your consent to do so. Moreover, we share personal data on an as-needed basis with our third-party service providers (e.g. to our email service provider in the course of emailing you information). These service providers process personal data on our behalf and under our instructions for the purposes described above.

Furthermore, we also share personal data with other third parties which process the data as joint data controllers or who are controllers in their own right. These joint data controllers include payment providers and financial institutions as well as law enforcement. We transfer personal data when this is necessary to do so.

Sharing data with these parties is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not transfer personal data you have provided unless we are satisfied that the personal data will be afforded an equivalent level of protection.

We will only transfer your personal data outside the UAE under the following circumstances:

1. The country where we send the personal data is providing an adequate level of protection for personal data as approved by the UAE Data Office from time to time.
2. The third party receiving the data has implemented suitable safeguards to ensure the security and protection of your personal data, in accordance with applicable laws.
3. The transfer is essential for the fulfilment of a contract between us and you (e.g., an education contract).

WHAT RIGHTS DO YOU HAVE OVER YOUR PERSONAL DATA?

Under data protection laws, you have the right to:

- obtain access to, and copies of, the personal data that we hold about you;
- correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data in certain circumstances;
- require us to restrict our data processing activities in certain circumstances;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller;
- object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights (including a right to object to receiving fundraising or communications, and to object to our profiling you for the purposes of fundraising or keeping in touch);
- where our processing is based on your consent, you may withdraw your consent at any time, without affecting the lawfulness of our processing based on consent before its withdrawal.

If you would like to exercise any of your rights under data protection law for which we are the data controller, please make your request by emailing us at dataprotection@englishcollege.ac.ae

Please note that these rights are not absolute, and we may be entitled or required to refuse requests where exceptions or exemptions apply.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits.

If you have any questions or concerns about how we are using your personal data or if you would like to exercise any of your information rights, please contact us at dataprotection@englishcollege.ac.ae

If you feel that we do not comply with applicable data protection and privacy rules, you may lodge a complaint with the competent data protection authority.

HOW DO WE RETAIN AND STORE YOUR PERSONAL DATA?

All personal data is securely stored in accordance with legal requirements and school policy. We retain personal data only for the legitimate purpose(s) for which the personal data was collected, relying on the legal basis as mentioned above, and only storing such data for as long as necessary to accomplish those purposes, or as required by law. After we no longer need to process a particular piece of personal data, it is securely destroyed in accordance with legal requirements.

Upon admission, data will be processed and retained according to the school's Data Retention Policy. For denied and withdrawn applications, we may retain data for seven (7) years from the date of denial or withdrawal.

When determining the suitable duration for retaining personal data, we take into account various factors. These factors include the quantity, type, and sensitivity of the personal data, the potential risks associated with unauthorised use or disclosure of your personal data, the purposes for which we process the data, alternative methods to achieve those purposes, and the relevant legal obligations.

We store the data we collect about you on servers located in the UAE, but it's important to note that your data may be transmitted, stored, and processed in countries that have different data privacy regulations compared to the UAE. This includes individuals working for us or our suppliers located outside the UAE. In order to fulfil the service you requested, it may be necessary to transmit, store, or process your information across different countries and entities. By providing your information, you acknowledge and consent to this. We are committed to handling your information securely and in accordance with this Privacy Policy, and we will take all necessary and reasonable measures to ensure compliance.

NOTIFICATION OF CHANGES

We may be required to update or change our Privacy Notice from time to time to reflect changes in the law and/or its privacy practices. We will inform you of any changes by providing you with an updated Privacy Notice.

CONTACT US

If you have any questions or concerns about how we are using your personal data, or if you would like to exercise any of your information rights for which we are the data controller, or if you'd like to lodge a complaint about our data practises, please send us a mail at dataprotection@englishcollege.ac.ae or contact us at the following address:

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info@englishcollege.ac.ae
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