

# Explanatory notes on privacy; how does the school deal with personal data

The school processes personal data of all its students. The school considers that the proper handling of personal data is vitally important and is aware of the privacy legislation. The school is responsible for the careful handling of your child's personal data. In these explanatory notes we would like to explain how we handle your child's personal data.

## *Why do we process your child's data?*

The school processes your child's personal data in order to comply with our obligations as an educational institution. For example, we need the data to register your child as a student at our school, to keep track of their study progress and to enable your child to obtain a diploma. In addition, we are legally obliged to forward certain information to other parties, such as DUO (Ministry of Education) and school attendance authorities (Leerplicht).

We process your child's data for the purpose of implementing the *education agreement* we have with your child and/or for the purpose of complying with our *statutory obligations*.

We will only process data that does not meet these requirements with your consent. If permission is requested for the processing of data, such as for the use of visual material (photos and videos), you can withdraw or give permission at any time. (Changing permission does not apply to visual material that has already been published).

## *What data do we process about your child?*

We process various types of data, most of which we have received directly from you as parents. This includes contact details and place of birth. If you refuse to provide us with the information we need, we will not be able to fulfil our obligations. The provision of this information is therefore a condition for your child to be able to enrol at school.

At your own request and with your explicit consent, we will also process your child's medical data. This is limited to the information needed to act properly in emergencies. For example, you may report that your child has epilepsy, so that we can take effective action in emergency situations. The school will never force you to provide such information.

## *How do we handle your child's data?*

The processing of the data is always based on necessity; we will not process more data than is necessary to comply with our rights and obligations as an educational institution. This also means that the data will not be used for purposes other than those referred to in these explanatory notes.

In a number of cases, as indicated above, we are obliged to share your child's details with other organisations. These include DUO, school attendance authorities (Leerplicht), the Dutch Inspectorate of Education, Municipal Health Service (GGD)/school doctor, the SEN consortium (Passend Onderwijs) and the accountant.

We may request commercial third parties to assist us in processing the data for the aforementioned purposes. This may involve applications to support students in their lessons, an administration system in which the data is not stored on our own network but with another organisation, or a curriculum program. This is always done by order and under the

responsibility of the school. We conclude agreements with these organisations, which lay down, among other things, which data is processed and how it is secured.

We will not share your child's data with commercial third parties for any other purpose. In addition, we will never sell or lease your child's data to third parties.

The personal data is stored in encrypted form as much as possible and only those members of staff can access the data that they need to perform their activities. In addition, we do not store the data for longer than is necessary. We use different retention periods for this, which are provided for and laid down by law. The retention period of completed examinations is, for example, two years after the termination of the education agreement. Data from the student administration is generally kept for seven years. If you are interested in this, we can provide you with a summary.

*What rights do students and parents of students under 16 have?*

As parents, you have a number of rights with regard to personal data. These rights are laid down by law. Students and/or parents can make use of these rights at any time. This means, for example, that you can always submit a request to inspect the data we process about your child.

In addition, you can also request that data be rectified, limited or completely deleted from the school's systems. You always have the right to supplement or rectify incorrect data. We will then ensure that this data is also adjusted by organisations with which we share and/or exchange this data about your child.

If you ask us to limit or delete your child's data, we will determine whether this is possible. When doing so, we comply with the statutory provisions and examine, for example, whether we do not have a statutory obligation to retain the data.

You also have the right to request that the data that we process from your child and that we have received from you be transferred to you or, at your request, to another organisation.

The school will not make any decisions about your child, which are only based on automated data processing (profiling). Decisions are never taken without human intervention.

If you disagree with how we handle your child's data, you can always seek clarification from our Data Protection Officer (see the school contact details). If you do not think your problem will be solved properly, you can report this to the Personal Data Protection Authority ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)).

*Summary of the categories of personal data:*

<b>Category</b>	<b>Explanatory note</b>
1. Contact details	<b>1a:</b> surname, first name, email, education ( <i>e.g. technical sector</i> ); <b>1b:</b> date of birth, gender; <b>1c:</b> other details, i.e.: address, postcode, place of residence, telephone number and any other information required for communication, as well as a bank account number for handling payments;
2. Student number	a record number which contains no information other than that referred to in category 1
3. Nationality and place of birth	
4. Parents, guardian	contact details of parents/guardians of students (surname, first name, address, postcode, place of residence, telephone number and any email address)
5. Medical data	data necessary for the health or well-being of the student,

- insofar as this is relevant for taking additional measures in order to be able to properly follow education (e.g. extra time for tests);
6. Religion information concerning the religion or conviction of the student, insofar as necessary for following the education (for example: student free on a particular day).
7. Study progress information concerning the nature and progress of education, as well as the study results attained, i.e.:
- Examination (information about the examinations)
  - Study programme
  - Counselling of student (including development perspective OPP)
  - Attendance record
  - Medical file (paper)
  - Class, grade, qualification
8. Educational organisation information with a view to the organisation of education and the provision or making available of teaching materials; this also includes class timetables, book lists, school passes, etc.
9. Finances information with a view to the calculation, recording and collection of registration fees, school and/or tuition fees and contributions or payments for teaching materials and extracurricular activities. (for example a bank account number of the parents)
10. Visual material photographs and video footage (with or without sound) of school activities on the basis of permission.  
**Please note:** Photographs for identification purposes do not require permission (school pass and as a supplement to the file).
11. Teacher / care coordinator /  
11. internal supervisor / dean /  
11. mentor details of **teachers and supervisors**, insofar as these details are relevant to the organisation of the establishment and to the provision of education, training and development
12. BSN (PGN) Within education, the BSN (Citizen Service Number) is called the personal number (PGN).  
It is also referred to as 'education number'. The PGN is the same number as the BSN. Schools are obliged to use the PGN in their administration.
13. Chain ID (Eck-Id) unique iD for the 'educational content chain'.  
This allows schools to share data without this being directly traceable to students or teachers.
14. Other details, i.e. .... information other than that referred to under 1 to 11, the processing of which is required or necessary with a view to the application of other legislation. These will be mentioned and explained separately.