



PRIVACY POLICY

Updated on August 2020

INTRODUCTION

The International School of Choueifat – Umm Al Quwain (collectively referred to as the “School”, “we”, “us”, “our”, or “ours”) values and takes your privacy rights seriously. We are committed to be transparent about the data we collect about you, how it is used and with whom it is shared as set forth herein.

This Privacy Policy (the “Policy”) applies to the data collected from all users of the iscummalquwain.sabis.net website (the “Website”) and the services available on the Website (the “Services”).

The recipient and controller of the data is:
The International School of Choueifat – Umm Al Quwain
Khalifa City, Umm Al Quwain,
U.A.E.

The terms “you,” “your,” and “yours” refer to the user or viewer of the Website / Services, as applicable.

This Policy, together with our Terms & Conditions, sets out the basis on which any personal data we may collect about you, or that you choose to provide to us, and your choices and rights regarding our use of your personal data. It also explains the purpose of processing your data and how we keep it safe. Please read the following sections carefully to understand our views and practices regarding your personal data and how we handle it.

We reserve the right to make changes periodically to this Policy at our sole discretion. Changes to the Privacy Policy will be posted on this page.

HOW TO CONTACT US

Questions, comments, and requests regarding this Policy should be addressed to our Data Protection Officer via E-mail at privacy@sabis.net or in writing to the following address:

The International School of Choueifat – Umm Al Quwain
Khalifa City, Umm Al Quwain,
U.A.E.
+971 6 766 5888



DEFINITIONS

Personal Data: Under the EU's General Data Protection Regulation (GDPR) personal data is defined as "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person."

Processing: Any operation performed upon personal data, including but not limited to collection, storage, use, erasure, recording, disclosure, transmission, alteration, distribution, etc.

Data Subject: Any individual whose personal data is being collected, held, or processed.

INFORMATION COLLECTED ON OUR WEBSITE

The type of Personal Data the School collects about students and parents and/or guardians ('Parents') before, during, and after the course of a student's enrolment at the School as well as other individuals/visitors who come into contact with the School include the following:

- Contact Details (e.g. name, home address, E-mail address, phone number)
- Content Data (e.g. text input)
- Identity Verification (e.g. photo, passport number, date of birth)
- Sensitive/Special Category of Data (e.g. health, religion)
- Usage Data (e.g. interest in Website's contents, access time)
- Online/Technical Identifiers (e.g. device information, IP address)

The School collects the Personal Data held about a Data Subject through an "Application Form," "Interest Form," or other forms filled out by Parents, essential to process your application and to contact you.

On occasions, the Website's visitors provide their personal data by using the "Contact us" form. Mandatory details are necessary to make contact with you and process your enquiry.

To improve the way our Website functions for visitors, to monitor, investigate, and report any security breach attempts of our Website, we automatically collect:

- Information about the browser type and version used
- The user's IP address
- The date and time of access

Note: The data stored in the log files is essential for the Website operation and is erased within 7 days.

This Policy also applies to Personal Data we collect from you via the use of cookies and related technologies to maintain an anonymized users' session, and to provide users with personalized web pages. You can control how you use cookies by adjusting the settings within your browser. For further information, please see our "Cookies Policy."



Use of Google Analytics

The Website uses Google Analytics – a web analytics service from Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. (“Google”) – to generate reports on the Website activities, which help us improve our services using active IP anonymization.

For more information about Google Analytics cookies, access the following link:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

To opt out of Google Analytics (relating to your use of our Website), you can adjust your cookies settings, or you can download and install the Browser Plugin available by visiting:

<https://tools.google.com/dlpage/gaoptout?hl=en>

The School places a lot of importance on protecting the privacy of young children who may use the Website. The School does not knowingly solicit or collect the personal data of children under the age of 18 on this Website. Children under the age of 18 are not permitted to submit an application or interest form to the School. Parents or legal guardians of a child under the age of 18 must complete the form and consent to the submission of an application to the School.

PURPOSE OF DATA COLLECTION

Any of the information we collect from you may be used in the following ways:

1. Information You Give to Us Voluntarily

Personal Data will be collected and stored about the prospective student and his/her family for the purpose of evaluating him/her. The School will also use the information to communicate with the family during the admission process.

For the student’s registration, Personal Data will be collected and stored about the student and his/her family to manage the admission process. Certain types of personal data are more sensitive than others; this includes information about health or religion. Where we collect and receive these types of information about your child, we will use it for your child’s legitimate interest in being able to provide him/her with the appropriate dietary/medical assistance, to reply to legal obligations, to respond to your inquiries when you contact us, or to send you our newsletter when you sign up for it, and where you have consented to be contacted for such purpose.

2. Information We Collect Automatically About You

To ensure that content from our site is presented in the most effective manner for you, to administer our Website, and to perform internal statistical and trend analysis to improve the user experience and performance of our Website.

No automated or profiling-based decision making would be performed.

You may request to stop receiving any marketing material by sending an E-mail to privacy@sabis.net or by clicking on the “unsubscribe” button.



DATA SECURITY

We will process (collect, store, and use) your personal data in a secure manner.

We have implemented administrative, technical, and physical security measures to help prevent accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access. Despite these measures, no data transmission over the Internet can be entirely secure, and we cannot guarantee or warrant the security of any information you transmit via our Website.

We make reasonable efforts to restrict access to information to only employees and agents who need access to such information in order to operate, develop, improve, or deliver our programs, products, and services.

The security of your Personal Data, collected for the above-mentioned purposes, is important to us and we confirm to apply acceptable security measures and procedures to ensure the confidentiality, integrity, and availability of the data.

LINKS TO OUR SOCIAL MEDIA PORTALS

We maintain an online presence on social media networks and platforms in order to communicate with users and interested parties and inform them about our services.

With that, your data may be processed beyond your country/geographical region. Depending on the social media provider (Facebook - Twitter), it may be that other data processing are performed by them. For details, refer to the following terms of use and data privacy policies of the respective social media portals.

Facebook

We have a Facebook account. The provider of this platform is Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA. You can set your privacy preferences independently via your Facebook user account by clicking on this link and logging in: <https://www.facebook.com/settings?tab=account>
For further details please refer to the Facebook privacy policy: <https://www.facebook.com/about/privacy/>

Twitter

We use the short messaging service Twitter. The provider is Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. You may adjust your Twitter data privacy settings independently via your user account. To do so, click on this link and log in: <https://twitter.com/personalization>
For further details please refer to the Twitter privacy policy: <https://twitter.com/de/privacy>

LINK TO ONLINE VIDEO HOSTING

We use Vimeo, the online video hosting service from Vimeo Inc., 555 West 18th Street New York, New York 10011, on our Website. You may adjust your Vimeo data privacy settings by referring to their privacy policy found at: <https://vimeo.com/privacy>



EXTERNAL LINKS

Our Website contains links to external websites within the SABIS® Global Network. Please refer to each of these websites' privacy policies to know more about the processing of data on these external websites.

USE OF GOOGLE MAPS

We use Google Maps on our Website. Google Maps is a service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

The Google Maps plug-in is included by embedding the service on our Website using what is known as *iFrames*. When loading these *iFrames*, under certain circumstances, Google may collect and process information (including personal data). We cannot exclude the possibility that Google may also transmit this information to a server in a different country.

We do not collect any data when you use Google Maps through our Website.

The purpose of having Google Maps on our Website is to display our address and make further information available to you by providing access routes to the respective locations; therefore, making it possible for you to plan your journey independently.

Information on Google's existing Privacy Shield certification and other relevant data on Google's data processing within the framework of the use of Google services can be found at: <https://policies.google.com/privacy>

The legal basis for the processing of personal data described herein is for your legitimate interest in benefiting from the great services which Google Maps offers.

PERSONAL DATA ERASURE AND STORAGE DURATION

We will endeavor to keep your information accurate and up-to-date, and not keep it for longer than is necessary.

Information you submit under the "Contact us" form will be stored in our databases for one year only in an anonymized format and would be automatically deleted afterwards. Also, the information we collect from you for our newsletter subscription would be deleted once you unsubscribe.

Information you submit under the "Interest Form" will be stored in our databases in an anonymized format for five years in case of prospective students' non-admission and for twenty-five years after the student's graduation / departure from the School in case of prospective students' acceptance.

Information you submit under the "Application Form" will be stored in our databases in an anonymized format for twenty-five years after the student's graduation / departure from the School.

Cookies will remain stored on your device until you delete them.



We have no impact over the duration for which data held by social network operators are stored for their own purposes. For details please refer directly to the social network operators' privacy policies.

PERSONAL DATA TRANSFER AND SHARING

The School is part of the SABIS® Global Network. Therefore, your personal data will be transferred to SABIS Educational Systems, Inc., Eden Prairie, Minnesota, USA, which works together with the processor CenturyLink Inc, Monroe, Louisiana, USA, on the provisioning of IT systems. SABIS Educational Systems, Inc., maintains our Website and databases where the personal data of Data Subjects covered by this Policy is stored in an anonymized format.

If you choose to register for receiving our newsletter, your E-mail address will be stored in our databases in an anonymized format and shared with SABIS Educational Services, Adma, Orange Zone, Lebanon, which provides this service on our behalf.

DISCLOSURE TO THIRD PARTIES WITHOUT PREJUDICE TO THE PREVIOUS CLAUSE

We do not pass on your personal data to third parties without first obtaining your consent.

However, we may be required to disclose your personal data if we receive a valid request from the police or other law enforcement agency, regulatory or government authority in your country of origin or elsewhere.

LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

Our legal basis for processing your personal data is dependent on the purpose for processing and may vary as described in this Policy and the service you are using. In general, we process your Personal Data under the following legal bases:

Your Consent

We process your Personal Data if you have consented to the processing activity. You may revoke your consent at any time by sending an E-mail to privacy@sabis.net. Doing so will bar us from further processing of your Personal Data based on your consent, but will not impact the lawfulness of processing based on your consent before it was withdrawn.

Legal Obligations

We process your Personal Data as needed to comply with laws and regulations.

Legitimate Interests

We process your Personal Data for our legitimate interests, to provide you with the Services, such as connection with managing, developing, testing, securing, and in limited circumstances marketing, advertising, and making recommendations regarding our products and services. Any of such processing is conducted subject to appropriate measures to protect your fundamental rights and freedom related to your Personal Data, and in any event will be subject to the restrictions provided in this Policy.



DATA SUBJECT RIGHTS

In certain circumstances, you have certain rights regarding your Personal Data. A summary of each right and how you can exercise it is set out below. To exercise any of these rights, please contact us by sending an E-mail to privacy@sabis.net

- Right of access – you have the right to request from us a copy of the Personal Data we hold about you.
- Right of rectification – you have the right to ask us to correct inaccurate or incomplete data we hold about you.
- Right to request deletion – in certain circumstances, you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – under certain conditions, you have the right to ask us to restrict the processing of your personal data.
- Right of portability – you have the right to have the data we hold about you in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another organization, where technically feasible.
- Right to object – you have the right to object to certain types of processing, such as direct marketing.
- Right to object to automated processing, including profiling – profiling-based activities are not carried out under any circumstances.
- Right to lodge a complaint – if you object to our processing of your personal data, you have the right to complain to the Data Protection Authority (DPA) in the country where you reside, or the alleged infringement of data protection laws has taken place.

ADDITIONAL INFORMATION

For any concerns or questions, you may contact us by:

1. Using the “Contact us” page on this Website
2. Emailing us at: iscummalquwain@sabis.net
3. Writing us at: The International School of Choueifat – Umm Al Quwain, Khalifa City, Umm Al Quwain, U.A.E.

ACCEPTANCE AND CHANGES TO THE POLICY

By using our services, you signify your agreement to this Privacy Policy. Any changes we may make to this Policy in the future will be posted on this page.