

# Privacy Policy 2020 / 2021



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Nibras International School is part of the International Schools Partnership (International Schools Partnership Limited and its subsidiaries being “we”, “us” or “ISP”).

ISP is committed to protecting and respecting your privacy. For the purposes of this Privacy Policy (the “**Policy**”), ISP is a “data controller”, which means that we are responsible for deciding how we hold and use personal data about you.

This Policy sets out why we collect personal data about individuals and how we collect and use that data in accordance with applicable local data privacy laws, including where applicable the European General Data Protection Regulation (EU) 2016/679.

If you have any questions about this Policy or concerning your personal data, please contact [feedback@nisdubai.ae](mailto:feedback@nisdubai.ae)

## What type of personal information we collect

The type and amount of information we collect depends on why you are providing it. The information we collect when you make an inquiry includes:

- First name;
- Last name;
- Job title;
- Gender;
- Date of birth;
- Email (for login);
- Address (including billing address);
- Postcode; and
- Geo-location data (your geographical location based on your IP address).

If you are a job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

## How we collect information

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- visit our website;
- enquire about our activities or services;
- sign up to receive news about our activities;
- create or update a profile;
- post content onto our website/social media sites;
- attend a meeting with us and provide us with information;
- take part in our events; or
- contact us in any way including online, email, phone, SMS, social media or post.

## Where we collect information from

We collect information:

(1) from you when you give it to us directly: you may provide your details when you ask us for information, attend our events, or contact us for any other reason. Your information may be collected by an organization we are working with, but we are still responsible for your information.

(2) when you give it to us indirectly: your information may be shared with us by other organizations. They should only do so in the way they have set out in their own privacy policy which you should check when you give your details.

(3) when you have given other organizations permission to share it: your information may be provided to us by other organizations if you have given them your permission. This might for example be a business working with us or when you buy a product or service from a third-party organization. The information we receive from other organizations depends on your settings or the option responses you have given them.

(4) when you use our website: information about you is recorded and stored when you use our website. See the information about the use of cookies under that heading below.

(5) when it is available on social media: depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram, or Twitter, you might give us permission to access information from those accounts or services.

## How we use your information

We will use your personal data in a number of ways as set out below. These may include Nibras International School and members of the wider ISP group (some of which are based outside of the United Arab Emirates):

- providing you with the information or services you have asked for;
- sending you communications with your consent that may be of interest, including marketing information about our services and activities (including those of the wider ISP group);
- when necessary, for carrying out your obligations under any contract between us;
- seeking your views on the services or activities we carry on so that we can make improvements;
- maintaining our organizational records and ensuring we know how you prefer to be contacted;
- analyzing the operation of our website and analyzing your website behavior to improve the website and its usefulness; and
- processing job applications.

## Use of aggregated data

Where data can be aggregated (and anonymized), we may use this for research purposes without restriction.

For example, we may monitor customer traffic patterns, Site, and Services usage, and related information in order to optimize users' usage of the Site and Services and we may give aggregated statistics to a reputable third party.

We may do this because the resulting data will not personally identify you and will therefore no longer constitute "personal data" for the purposes of applicable data protection laws.

## Our legal basis for processing your information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at [feedback@nisdubai.ae](mailto:feedback@nisdubai.ae). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned. If you are under the age of eighteen (18), we are required to obtain the explicit consent of your parent or legal guardian if we are processing your personal data on our website;
- it is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract;
- it is necessary to comply with our legal obligations; and
- where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for our legitimate interests in relation to providing the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.

If you want to contact us about your marketing preferences please contact [feedback@nisdubai.ae](mailto:feedback@nisdubai.ae).

## How we keep your information safe

We understand the importance of keeping your personal data secure and take appropriate steps to safeguard it.

We always ensure only authorized persons have access to your information, which means only our employees and contractors, and that everyone who has access is appropriately trained to manage your information.

No data transmission over the internet can be guaranteed to be completely secure. So whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

## Who has access to your information?

- Third parties who provide services for us. We select our third-party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do.
- Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any event.
- Analytics and search engine providers that help us to improve our website and its use.
- Third parties in connection with restructuring or reorganization of our operations, for example, if we merge with another business. In such an event, we will take steps to ensure your privacy rights will be protected by a third party.

Owing to matters such as financial or technical considerations, the information you provide to us may be transferred to countries outside the United Arab Emirates, which may not be subject to the same data protection regulations as apply in the United Arab Emirates. We meet our obligations under applicable data privacy laws by ensuring that the information has equivalent protection as if it were being held within the United Arab Emirates. We do this by ensuring that adequate safeguards are put in place with any third parties receiving and processing your personal data outside the United Arab Emirates for example by entering into a data processing agreement.

As noted above, the Nibras International School is part of ISP. The Nibras International School may share your personal data with other members of the ISP family (which may include the transfer of data outside of the United Arab Emirates, for example to Europe) and who may contact or share information with you, in each case in order to pursue our legitimate interests. Any such ISP corporate affiliate may use your information only according to the terms of this Policy.

We may also disclose your personal data if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights but is necessary and in the public interest. Other than this, we will not share your information with other organizations without your consent.

# Keeping your information up to date

## Cookies

In addition to the information which you supply to us, information and data may be automatically collected through the use of cookies. Cookies are small text files employed on our website (the “Site”) to recognize repeat users and allow us to observe behavior and compile aggregate data in order to improve the Site for you. For example, cookies will tell us whether you viewed the Site with sound or with text on your last visit. Cookies also allow us to count the number of unique and return visitors to our Site. Some of our associated companies may themselves use cookies on their own websites. We have no access to or control of these cookies, should this occur.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Certain laws state that we can store cookies on your machine if they are essential to the operation of the Site, but that for all others we need your permission to do so.

The list below explains the cookies we use and why:

| <b>Cookie Description</b> | <b>Name</b> | <b>Purpose</b>   |
|---------------------------|-------------|--|
| Google Analytics          | _ga         | Used to distinguish users  |
| Google Analytics          | _gid        | Used to distinguish users  |
| Google Analytics          | _gat        | Used to throttle request rate  |
| CloudFlare                | _cfduid     | Identify individual clients behind a shared IP address and apply security settings on a per-client basis. This cookie is strictly necessary for Cloudflare’s security features and cannot be turned off. |

|         |        |  |
|---------|--------|--|
| addThis | _atuvc | enable visitors to share content with a range of networking and sharing platforms. It stores an updated page share count.      |
| addThis | _atuvS | enable visitors to share content with a range of networking and sharing platforms. It stores an updated page share count.[PF5] |

### Opting out of cookies

If you do not wish to receive cookies from us or any other website, you should be able to turn cookies off on your web browser: please follow your browser provider's instructions in order to do so. Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies.

### How long we keep your information for

We will hold your personal data for as long as it is necessary for the relevant activity. Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for two (2) years. We may periodically ask you to renew your consent.

If you ask us to stop contacting you with marketing materials, we will keep a record of your contact details and the limited information needed to ensure we comply with your request.

## Your rights

Under certain circumstances, you may have the right to:

- request details of the processing activities that we carry out with your personal data through making a subject access request. Such requests have to be made in writing. More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request, please contact us at [feedback@nisdubai.ae](mailto:feedback@nisdubai.ae)
- the right to request the correction of information that is inaccurate or out of date;
- the right to request deletion or removal of your information if the purpose for which such personal data was processed no longer exists or if there is no longer any reason to maintain the personal data by us;



- the right to object to the way that we are processing your information if it is unnecessary for the purposes for which we have collected it or if such processing is discriminatory, prejudicial, or in violation of the law; and
- the right to withdraw the consent that you have previously given for us to process your personal data.

All of these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact Reception at the above address.

### **Surveys and user groups**

We always aim to improve the services we offer. As a result, we occasionally canvass our customers using surveys (where the customer has opted in for this). Participation in surveys is voluntary, and you are under no obligation to reply to any survey you might receive from us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all other customer information.

### **Competitions**

Your participation on our Site may mean that we occasionally contact you with the opportunity to enter competitions (where you have opted in to receive information about competitions). Entry to competitions is voluntary, and you are under no obligation to take up an invitation from us to enter. Should you choose to enter a competition, we will treat the information you provide with the same high standard of care as all other customer information and use the information provided strictly within the entry terms of the competition and this Policy.

### **Changes to this Policy**

This Policy may be changed from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes. We recommend that you read this Policy each time you consider giving your personal data to us.