



## THE ENGLISH COLLEGE DUBAI L

### WEBSITE 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 privacy notice describes what information we collect about you, how we obtain your information and how we use your information. It also tells you how to contact us as well as outlining what rights you have with regard to your personal data.

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

#### WHO ARE WE?

The English College Dubai 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, the "website" refers to the <https://englishcollegedubai.com> website and "you" and "your" refers to our students, the parents of our students or any individual accessing our website or contacting us to request further information about 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?

We process personal data about visitors to our website; prospective, current and past students and their parents; staff and contractors; and other individuals connected with or visiting our school.

The information we may collect from you includes:

- names, addresses, telephone numbers, e-mail addresses, emergency contact information;
- IP addresses, location data, and website statistics and analytics;
- website cookies;
- students' date of birth, nationality, family details;
- admissions, academic, disciplinary and other education related records, references, examination scripts and marks;
- parents' employment data;

- financial information and identification documents (e.g. for fundraising);
- information relating to your use of our website (for example, domain name, IP, address and cookies); and
- any information you independently choose to provide to us (for example, if you send us an email or call us about an application for your child to the school).

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 concerning:

- health;
- special education needs;
- biometric data;
- information relating to safeguarding and child protection/welfare
- race ethnicity; or
- religion.

### **HOW DO WE OBTAIN YOUR INFORMATION?**

We collect most of the personal data we process directly from the data subject concerned (or often in the case of students, from their parents. In some cases, we collect data from third parties (for example, referees/references, and previous schools) or from publicly available resources.

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;
- you visit our website;
- you sign up to receive email our newsletter and/or prospectus;
- you have expressed an interest in working for, or with, us; or
- you are employed by us or an organisation with whom we have a business relationship.

### **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) analysing website traffic, demographics and behaviour through the use of analytical tools and cookies;
- (c) the promotion of our school through our website(s), our prospectus and other publications and communications (including through our social media accounts);
- (d) to support students with their learning;
- (e) to monitor and report on student progress;
- (f) to provide appropriate care to our students;
- (g) to assess the quality of our services as a school;
- (h) to keep the students safe (e.g. food allergies or emergency contact details);
- (i) to meet our legal duties placed upon us by applicable educational regulatory authorities;
- (j) to respond to any queries, requests, or comments that you may have;
- (k) to process your payments;
- (l) to review, develop and improve the services which we offer;
- (m) to comply with our legal obligations;
- (n) to carry out background and reference checks, where applicable.
- (o) to communicate with you about your employment with the school.
- (p) to carry out our obligations as an employer.

## **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:

- 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.
- Performance of a contract: We may 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.
- 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?**

We will only disclose or transfer your personal data for the purposes set out in this notice to:

- (a) schools that the students attend after leaving us;
- (b) our local authorities, including the Ministry of Education, Dubai Health Authority and the Dubai Knowledge and Human Development Authority;
- (c) youth support services, where applicable;
- (d) third party service providers and subcontractors who provide a service to us (including but not limited to marketing, data processing, IT and office services);
- (e) any member of our group; and
- (f) any other competent authorities if we are legally required to comply with a request for data.

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

1. 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.
2. The transfer is essential for the fulfilment of a contract between us and you (e.g., an employment 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 or if you have any questions or concerns about how we are using your personal data, please make your request by emailing us at [dataprotection@englishcollege.ac.ae](mailto: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 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. We retain personal data only for legitimate purposes, relying on one or more of the lawful bases as set out above, and only for so long as necessary for those purposes, or as required by law.

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 Notice, and we will take all necessary and reasonable measures to ensure compliance.

### **COOKIES**

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

- a. We use cookies to help you navigate efficiently and perform certain functions.
- b. The cookies that are categorised as "Necessary" are stored on your browser as they are essential for enabling the basic functionalities of the site.
- c. We also use third-party cookies that help us analyse how you use this website, store your preferences, and provide the content and advertisements that are relevant to you. These cookies will only be stored in your browser with your prior consent.
- d. You can choose to enable or disable some or all these cookies but disabling some of them may affect your browsing experience

We use the following cookies:

- a. Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- b. Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- c. Functionality cookies. These are used to recognise you when you return to our website. This enables us to remember your preferences (for example, your choice of language or region).

We do not share the information collected by the cookies with any third parties.

Website visitors may choose to block our website's cookies by activating the browser setting that allows the visitor to refuse the setting of all or some cookies. However, if the visitor blocks all cookies (including essential cookies) you may not be able to access all or parts of our website.

Users can select which, if any, cookies they wish to accept using the "Cookie settings" on our website(s), which allows visitors to opt-out of each cookie category.

## **HYPERLINKS**

Our websites may contain links to third-party websites for your convenience. When you click on those links, you will be directed away from our website. Please note that we have no control over those websites or their privacy practices, which may vary from ours. We do not endorse or make any claims about the third-party websites. This Privacy Notice does not cover any personal data you choose to provide to unrelated third parties. It is advisable to review the privacy policy of any company before sharing your personal data. In some cases, certain third-party companies may opt to share your personal data with us; however, such sharing is subject to the privacy policy of that particular third-party company.

## **NOTIFICATION OF CHANGES**

We may be required to update or change our Privacy Notice from time to time. We will upload an updated Privacy Notice on this website.

## **CONTACT US**

This Privacy Notice sets out in broad terms how we handle your personal data and safeguard your privacy. If you have any question, requests or issues, send us a mail at [dataprotection@englishcollege.ac.ae](mailto:dataprotection@englishcollege.ac.ae) or contact us at the following address:

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