



International Student Club, Hillside, The Springs, Bowdon, Cheshire WA14 3JH.  
Tel 0161 929 9002. Email: [nic@student-club.co.uk](mailto:nic@student-club.co.uk) or [al@student-club.co.uk](mailto:al@student-club.co.uk)

## **International Student Club**

### **Data Protection Privacy Notice – Parents**

This privacy notice explains what data we collect about you, how we use and store it, who we share it with and how we keep it safe. As of May 25, 2018, new European Union (EU) data protection legislation, General Data Protection Regulation (GDPR) is being introduced to give individuals greater control over their data and how it is used. This privacy notice incorporates those changes.

We hope to fully inform you of how we handle your data and your rights. However, if you have any questions please get in contact with Nicola Lee, our Data Protection Officer (DPO), who will be happy to help. We will notify you if any changes are made to this privacy notice.

#### **1. What personal data do we collect?**

- Contact details for parents
- Banking details for parents
- Email correspondence

#### **Student Data**

- Enrolment forms which include the student's name, age, medical conditions, learning needs and dietary requirements, address, mother/father's email address and phone number
- Flight details
- Passport details
- Copies of ID documents
- Visa application details
- Transfer details
- Registers – students names and ages
- Certificates and reports – student's level and teacher evaluation
- Photos and testimonials for social media and marketing purposes
- Photos and names for student information wall in teaching block

## **2. What lawful processes do we have for processing your data?**

### **Consent**

Under the new GDPR legislation, some of your data is classified as special category. This includes copies of student's documents, photos and health data. We will also ask for consent before sending newsletters by email. We will only collect and process this data with your specific consent. You have the right to withdraw your consent at any time.

### **Contractual Obligations**

We collect and process some of your data to perform contractual obligations, such as to send out invoices for payment or to collect flight details so that we can organise transfers to and from the airport.

### **Legal Requirements**

We are required by law to collect and process some of your data, such as to request identification documents, parental consent forms, details of student visas and to maintain student registers. We also keep Accident Reports in compliance with Health and Safety law and record Safeguarding/Prevent incidents as part of Child Protection legislation.

### **Legitimate Interests**

In specific situations, we require your data to pursue legitimate interests in running our business, such as creating academic reports to help students meet future learning goals and recording emergency contact details for staff and students.

## **3. Who will we share your data with?**

We sometimes share your personal data with trusted third parties. However, we provide only the information they need to perform their specific services.

ISC staff – ISC staff are made aware of the student's name, age, gender and nationality. We only share the student's health data, such as allergies, dietary requirements and learning/behavioural difficulties if consent is given and in accordance with Safeguarding legislation. If consent is not given, the student may not be enrolled on the course, as our ability to provide adequate duty of care may be affected.

Individuals' Leader – the individuals' leader records the names and mobile numbers of individual students to ensure their safety on trips and on campus.

Accountancy Firm – we share payment records with them when processing end of year accounts.

Haileybury – we inform the kitchen staff of dietary requirements. If deemed necessary and only with consent, Haileybury staff are informed of health data to ensure the safety of staff and students on campus.

Instagram – we use photos from the course on the ISC Instagram account.

ISC website and publicity materials – photos and videos taken from the course are used to promote ISC in our brochures and on our website.

#### **4. How do we protect your data?**

Your sensitive data is never collected or used without consent. All hard copies of sensitive data are kept in a lockable filing cabinets and a password protected OneDrive account is used to store sensitive data digitally.

#### **5. How long do we store your data?**

Student Data – For legitimate business interests, we retain digital and hard copies of student enrolment forms for three years, as students often re-enrol.

Student Database – We keep a digital copy of the student database on a password encrypted hard drive for three years on a legitimate basis of student re-enrolments.

Parent contact details and banking details - Parents' contact details, which can be found on booking forms, will be kept for three years due to a legitimate basis of student re-enrolments. Parents' banking details will only be kept for the purposes of reimbursement or to provide records of payment in end of year accounting.

Photos/Videos – Photos/videos taken for the purposes of social media and marketing will be held digitally for as long as necessary.

Safeguarding and Prevent Reports – Only viewed by the DPO and course directors. These are retained on a lawful basis for as long as necessary.

Accident and Health & Safety Records – Accident and health and safety records are retained for 12 years. Chemical accident reports must be kept for 40 years.

#### **6. Your choices and rights.**

You have the right to:

- access your personal data
- correct your personal data
- withdraw your consent on how we use your data at any time
- request a copy of your personal data held by ISC (requests must be responded to within 1 month)

We will ask you for consent before we use any special category personal data. You have the right to withdraw your consent at any time. Please note, that some of your choices or changes to consent may affect our ability to fulfil our contractual or legal obligations. In such circumstances we may have to withdraw our employment offer or terminate your employment. For e.g.

##### **Legitimate Basis for Processing Special Category Data**

If a parent did not give consent for us to share their child's dietary requirements with Haileybury kitchen staff, we would not be able to fulfil our contractual obligations to care for and protect our students.

##### **Lawful Basis for Processing Special Category Data**

If an applicant did not give us consent to share their personal data with the Disclosure and Barring Service (DBS) to carry out a criminal background check, we would have a lawful reason to not employ that person given ISC's duty of care for under 18s.

## **7. Contact us**

Please contact Nicola Lee, our Data Protection Officer (DPO), if you have any further questions.

Our DPO should also be contacted if you would like to amend or correct your details, withdraw consent for use of your data or if you would like to request a copy of your personal data held by ISC.

**Email:** [nic@student-club.co.uk](mailto:nic@student-club.co.uk)

**In writing: FAO** – Nicola Lee, DPO, International Student Club, Hillside, The Springs, Bowdon, Cheshire WA14 3JH

**Tel:** (+44) 161 929 9002 or (+44) 7947 655094

## **8. How to make a complaint.**

If you feel your data has not been handled properly or you are not satisfied with our response to a personal data request or enquiry, you can make a complaint with the DPO or with the Information Commissioner's Office (ICO).

### **Information Commissioner's Office**

**Email:** [registration@ico.org.uk](mailto:registration@ico.org.uk)      **Tel:** (+44) **303 123 1113**

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.



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## **International Student Club Data Protection Consent Form – Parents**

Please read the statements below and circle **YES** to give your consent, **NO** to not give your consent or **NA** (not applicable) if the statement does not apply to you.

- |           |  |
|-----------|--|
| YES/NO    | I have read and agree to the above ISC Privacy Notice.   |
| YES/NO    | I am happy for ISC to send me newsletters by email.  |
| YES/NO    | I agree to my son's/daughter's photo being used on the ISC Instagram account.  |
| YES/NO    | I agree to my son's/daughter's photo being used for marketing purposes on the ISC website and in the ISC brochures.  |
| YES/NO    | I agree to my son's/daughter's photo being displayed on the ISC student photo wall in the teaching department.   |
| YES/NO/NA | I agree to my son's/daughter's dietary requirements being shared with ISC staff and Haileybury kitchen staff.  |
| YES/NO/NA | I agree to my son's/daughter's learning/behavioural needs being shared with ISC staff.   |
| YES/NO/NA | I agree to my son's/daughter's health data (e.g. allergies or disabilities) being shared with ISC staff and Haileybury staff to ensure the safety of my child on campus. |

**Name of Student:**.....

**Signed:**

**Date:**

Please email our Data Protection Officer, Nicola Lee, if you have any questions regarding your data or if you wish to withdraw your consent at: [nic@student-club.co.uk](mailto:nic@student-club.co.uk)