

# PRIVACY NOTICE

This Privacy Notice (the "Notice") explains how The English School collects and processes the personal data of its pupils and students. Personal data is processed in accordance with applicable legislation and with the data protection principles of the EU General Data Protection Regulation (GDPR).

The privacy of our pupils and the protection of their personal data are of great importance to The English School, and we are committed to safeguarding them. We work continuously on both data protection and information security, and we develop our practices to improve these areas.

We provide information about data protection and the processing of personal data on our website, and on request we provide this information to the data subject. Our processing of personal data is defined and documented. We maintain and regularly update our data protection documentation.

Personal data is collected for various purposes, and different types of data are processed according to those purposes. This Notice describes in more detail the data held in the pupil register and the purposes for which it is used.

## CONTROLLER

The controller under applicable data protection law is The English School (hereafter "The English School", "we", "us" or "our"). The English School is responsible for ensuring that your personal data is processed in accordance with this Notice and applicable data protection legislation.

### Contact details of the controller:

The English School Ltd (Englantilainen koulu Oy)

Business ID: 1048676-1

Address: Mäntytie 14, 00270 Helsinki, Finland

Email: english.school@engs.fi

Data protection matters: tietosuoja@engs.fi

## 1. COLLECTION OF PERSONAL DATA

Personal data is collected from the pupils and students themselves and from their guardians. Personal data is also transferred from the previous school when a new pupil begins at our school. Information relating to a pupil's schooling and studies accumulates in the register through our teachers and administrative staff. The register is also kept up to date through automatic updates, for example from the Digital and Population Data Services Agency (Digi- ja väestötietovirasto).

Log data accumulates from our systems when data is updated. The accuracy of personal data is checked with students, pupils and guardians at the start of each school year. At the same time, we ask for specific permissions relating to the use of data, such as permission to publish photographs and names.

Only data that is necessary is processed in the pupil register. We collect and process the following personal data:

- first name and surname
- contact details, such as address, telephone number and email address
- guardians' details

- teaching group
- year group
- system login credentials, such as usernames and passwords (passwords are not stored in plain text)
- content produced by the pupil
- information provided and added by the pupil
- country of residence, country of birth and mother tongue
- sex
- date of birth and personal identity code, and nationality
- religious affiliation and information relating to religious education (special categories of personal data)
- information relating to competence and learning, including assessment data
- pedagogical information
- other information relating to schooling, such as absences and information relating to disciplinary matters
- information relating to the need for support
- information relating to pupil welfare services
- preferences submitted in the school application process
- supplementary material from aptitude tests
- subject choices
- library card details
- information on devices issued to the pupil
- device serial number
- change and log data relating to the specified information above

## 2. PURPOSES AND LEGAL BASIS FOR PROCESSING

We collect and process only personal data that is necessary for the provision of education and for other appropriate purposes.

We process your personal data for the following purposes:

### 1. Providing education and managing matters relating to the pupil relationship

We process personal data in order to fulfil our obligation to provide basic education (Basic Education Act, perusopetuslaki, sections 7 and 26) and general upper secondary education (General Upper Secondary Schools Act, lukiolaki, section 3). In these cases, the processing of personal data is based on a legal obligation.

Special categories of personal data: The processing of special categories of personal data arises from the tasks laid down for the education provider in the Basic Education Act, the General Upper Secondary Schools Act and the Compulsory Education Act (oppivelvollisuuslaki). (Under section 6 of the Finnish Data Protection Act (tietosuojalaki), Article 9(1) of the GDPR does not apply to processing that is laid down in law or that arises directly from a statutory task of the controller.)

The processing of the personal identity code is based on section 29(1) of the Finnish Data Protection Act. Distinguishing the data subject and their personal data unambiguously from other data subjects and their personal data is important for carrying out our statutory task.

Personal data is processed both in connection with applying to the school and during studies.

## **2. Disclosing statutory pupil numbers for national data collection**

We process personal data in order to report pupil numbers for national data collection. In this case, the basis for processing is a legal obligation (Act on the Financing of Education and Culture, laki opetus- ja kulttuuritoimen rahoituksesta).

## **3. Fulfilling data subject rights and responding to requests**

We process personal data in order to handle requests relating to data subject rights and requests relating to schooling. In these cases, the processing of personal data is based on a legal obligation (including the GDPR, the Basic Education Act and the General Upper Secondary Schools Act).

## **4. Maintaining and developing systems, and using and administering digital working environments**

Personal data may be processed in connection with tasks relating to the maintenance, administration and development of our systems, or the handling of incidents. In these situations, the processing of personal data is limited to the username, name and any log data. In these cases, the processing of personal data is based on legitimate interest.

## **5. Providing library services**

Personal data is processed in tasks relating to the operation of the school's internal library. In these cases, the basis for processing personal data is legitimate interest.

## **6. Other purposes to which you have consented**

We may process personal data on a case-by-case basis for purposes to which you have given your consent. In such cases, the processing is based on consent.

For processing operations based on legitimate interest, we have carried out a balancing test to confirm that the processing is appropriate.

# **3. TRANSFERS AND DISCLOSURES OF PERSONAL DATA**

We may transfer and disclose personal data to third parties:

- to the extent permitted or required by law, for example in connection with a request for information from a competent authority or in relation to legal proceedings
- when our partners or subcontractors process personal data on our behalf and on our instructions
- when we consider disclosure necessary to enforce our rights, to protect your safety or the safety of others, to investigate misuse, or to respond to a request from an authority
- with your consent, to the parties covered by that consent

A data processing agreement (DPA) has been concluded with our processors, or the processing of personal data has been defined in the main contract. We instruct our processors and ensure that personal data is processed correctly and appropriately.

With the specific written consent of the data subject, or of the guardian or other legal representative of a minor student, data may also be provided to other parties. Data may be disclosed where the provision of the data and the right to receive it are expressly laid down in law (Act on the Openness of Government Activities, laki viranomaisen toiminnan julkisuudesta, section 26).

The disclosure of public data from a personal data register held by an authority is governed by section 16(3) of the Act on the Openness of Government Activities. Under that provision, the recipient must have the right to store and use the personal data disclosed. Personal data may be disclosed only on the basis of a specific request for information (Act on the Openness of Government Activities, section 13(2)).

Confidential information may be disclosed to another education provider only with the consent of the student, or of the guardian of a minor student, or where the right to disclose or receive the data is laid down in law.

Personal data may be disclosed under section 56 of the General Upper Secondary Schools Act for the purpose of external evaluation of education (for example the PISA study or evaluations by the Finnish Education Evaluation Centre, Kansallinen koulutuksen arviointikeskus, KARVI). For this purpose, the personal data disclosed is limited to what is necessary for carrying out the evaluation. This does not involve the assessment of individual pupils.

#### **4. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU OR EEA**

As a rule, we do not transfer personal data outside the EU/EEA. Where processing requires a transfer outside the EU or EEA, we use appropriate safeguards. We may transfer personal data outside the EU or the European Economic Area in situations where our partners or their subcontractors are located outside these areas.

We use services whose provider or subcontractors may be located outside the EU/EEA. The main such service providers are Microsoft and Google, whose services we use in our learning environments, in communication and in device management. Microsoft Corporation and Google LLC are US companies that participate in the EU-US Data Privacy Framework. In addition, transfers are made using the standard contractual clauses approved by the European Commission.

Further information on the subcontractors used by these service providers and on their data processing terms:

- List of subcontractors used by Microsoft:  
<https://go.microsoft.com/fwlink/p/?linkid=2096306>
- Microsoft Professional Services Data Protection Addendum:  
<https://www.microsoft.com/licensing/docs/view/Professional-Services-Data-Protection-Addendum-DPA>
- List of subcontractors used by Google Workspace for Education:  
<https://gsuite.google.com/intl/en/terms/subprocessors.html>
- Standard contractual clauses approved by the European Commission, for Google:  
<https://cloud.google.com/terms/sccs>
- Google data processing addendum: <https://cloud.google.com/terms/data-processing-addendum/>

#### **5. RETENTION OF PERSONAL DATA**

Personal data is retained only for as long as is necessary to fulfil the purposes defined in this Notice.

Personal data is retained for the duration of studies and within the time limits laid down by law.

Personal data is deleted once its retention is no longer necessary for the fulfilment of the law or of the rights or obligations of either party.

#### **6. YOUR RIGHTS AS A DATA SUBJECT**

You have the right to exercise the rights of a data subject under the EU General Data Protection Regulation. These are:

- the right to be informed about the processing of your personal data
- the right of access
- the right to rectification
- the right to erasure (the right to be forgotten)
- the right to restriction of processing
- the right to object to processing
- the right to data portability
- the right not to be subject to automated decision-making

The exercise of these rights depends on the legal basis on which the personal data is being processed at the time. Personal data that is necessary for the fulfilment of the purposes defined in this Notice, or that we are required by law to retain, cannot be deleted.

Where we process your personal data on the basis of consent, you have the right to withdraw your consent at any time. After that, we will not process the personal data unless there is another legal basis for the processing.

You can exercise your rights by sending a request to us at [tietosuoja@engs.fi](mailto:tietosuoja@engs.fi).

If you consider that your personal data is not being processed appropriately, you have the right to contact the Data Protection Ombudsman (tietosuojavaltuutettu). You will find the Data Protection Ombudsman's contact details on their website: <https://tietosuoja.fi/en/contact-information>.

## **7. COOKIES**

We also use cookies and other similar technologies on our website at [www.engs.fi](http://www.engs.fi). Cookies are small text files placed on your device to collect and remember useful information, and to improve the functionality and usability of our website. We may also use cookies and other similar technologies for statistical purposes, such as compiling statistics on the use of the website, to understand how users use the site and to improve the user experience.

You can block the setting of cookies, restrict their use, or delete cookies from your browser. Because cookies enable our website to function, restricting their use may affect the usability of the site.

## **8. INFORMATION SECURITY**

We implement appropriate measures (including physical, digital and administrative measures) to protect personal data against loss, destruction, misuse and unauthorised access or disclosure. Personal data is accessible only to those individuals who need it to carry out their duties.

## **9. CHANGES TO THIS NOTICE**

We have the right to amend this Notice. We will announce any changes on our website at [www.engs.fi](http://www.engs.fi), where you will also find the most recent version of this Notice.

## **10. CONTACT US**

If you have questions about this Notice or would like more detailed information about the processing of your personal data, you can contact us by email at [tietosuoja@engs.fi](mailto:tietosuoja@engs.fi).