



SABIS®

PRIVACY POLICY

SABIS® (“We”), a global education network that has an active presence in 20 countries on five continents, its affiliates, subsidiaries, and network schools around the world, adopt this policy about the privacy of Personal Data collected from users of our website.

We are committed to protecting and respecting your privacy. We would never disclose your personal data to third parties or use it for bulk mail lists or newsletters unless requested or accepted by you. The processing of your personal data is in line with the data protection and privacy regulations.

This policy (together with our Terms and Conditions) sets out the basis on which any personal data you choose to provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.

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, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How do we process your and your child’s personal data?

In order for us to provide you with the credentials (username/password) to access this application and to benefit from the services listed below, we will be using the personal data collected directly from you upon your child’s admission/registration at SABIS® school. The personal data collected: Child Full Name, Gender, Photo, Home Address, Date of Birth, Nationality, Parents’/Guardians’ E-mail Addresses, Residence/Mobile Phone Numbers, Work Address, is stored in the school’s database in an anonymized format.

In any event, we are committed to ensuring that the information we collect will be appropriately used for the below purposes, for your legitimate interest, and would not constitute an invasion of your privacy:

- To support student learning, to monitor and follow up on students’ academic and non-academic performance:
 - Academic information
 - Display exams results
 - Course averages
 - Attendance and discipline records
 - SLO® participation in activities
 - School Calendar
 - Study Material (downloadable documents, videos, quizzes)
 - Online Courses

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- Non-Academic information
 - Announcements and photo galleries
 - Parent online ordering & payment
 - SABIS® Newsletters
 - SABIS® Videos

- To run analytics/statistics on students, sections, classes, and overall school's academic performance.

The special categories of personal data that are being collected and processed are: student's health/medical information – to make all necessary arrangement should the student require emergency medical treatment or if he/she has any food allergies.

Please check our Cookies Policy for the personal data that we may be collecting indirectly from you.

How do we protect your information?

We take reasonable precautions to secure your personal data, stored in an anonymized format in our databases, against accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access. These precautions include technical, physical and organizational security measures, that are appropriate with the sensitivity of the information, and that ensure its ongoing confidentiality, integrity and availability.

Please be aware that the transfer of your data over the internet into and out of our databases is encrypted through a secure https connection, which prevents unauthorized third parties from accessing your data.

The security of your Personal Data is important to us and confirm that we will be using the proper security measures and procedures to help ensuring the highest level of security.

In case of any data breach, you would be informed about the breach and in a timely manner without any undue delays.

What is the legal basis for processing your and your child's personal data?

Our legal basis for processing for the personal data is based on the Consent of the data subject.

Will we share your and your child's personal data with anyone else?

Students' personal data will be treated as strictly confidential, and will be shared only with our Corporate Office's Academic Development Department in Lebanon, and our Regional Centers in US, Egypt, Abu Dhabi, and Lebanon, for reporting purposes as part of the processing activities.

For support purposes, your personal data may be accessed by SABIS® authorized personnel and there are stringent controls in place regarding access and use of the data.

We will not pass on your or your child's personal data to third parties without first obtaining your consent.

In some countries, we are required by law to share our students' information with the Department for Education on a statutory basis.

How long do we keep your and your child's personal data?

We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. SABIS® is required to retain information in accordance with the educational requirements, such as information needed for statistical and individual needs purposes (i.e., grades). How long personal data should be kept may also be governed by specific business requirements and agreed practices.



Your Consent

By explicitly consenting to this privacy policy you are giving us permission to process your and your child's personal data specifically for the purposes identified.

You may withdraw consent at any time by sending an E-mail to: dpo@sabis.net. Please note that all processing of your personal data will cease once you have withdrawn consent but will not affect any personal data that has already been processed prior to this point. However, please understand that by withdrawing your consent you will not be able to access/use SABIS® applications.

Further Processing

If we need to use your or your child's personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new statement explaining this new use and getting your consent prior to starting the processing.

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

Your and your child's rights as a data subject

At any point while we are in possession of or processing your personal data, you and your child, the data subjects, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you by sending an email to dpo@sabis.net.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- 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 – you also have the right to be subject to the legal effects of automated processing or profiling. But so far, no automated or profiling-based decision making would be done.

You may at any time request to be provided with your submitted data in a structured, commonly used, and machine-readable format.

You have the right to request the restriction or suppression of your personal data by sending an E-mail to data-protection@sabis.net.

Complaints

To express a concern, raise a question, make a complaint, object to a processing or direct marketing or to obtain additional information about the processing of Personal Data by the SABIS® global network, you should contact us by sending an E-mail to data-protection@sabis.net

You may at any time contact our Data Protection Officer with regard to all issues related to processing of your personal data and to the exercise your rights.

If you consider that we did not process your personal data in accordance with the applicable regulations, you can file a complaint before the competent supervisory authority through the websites mentioned below.



The details for each of these contacts are:

- SABIS® Data Protection Officer (DPO) contact details: dpo@sabis.net
- Supervisory Authority contact details:

Country	Supervisory Authority	Website
United Kingdom	The Information Commissioner's Office	https://ico.org.uk
Germany	Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit	https://www.bfdi.bund.de
Romania	The National Supervisory Authority for Personal Data Processing	http://www.dataprotection.ro/

Changes to the policy

Any changes we may make to the privacy policy in the future will be posted on this page.

The Policy was last reviewed in May 2018