

ACS Doha International School Data Protection & Privacy Policy

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Introduction

Welcome to ACS Doha International School's data protection privacy policy.

ACS Doha International School respects your data privacy and is committed to protecting your personal data. This privacy policy explains how we look after your personal data when you visit our website (regardless of where you visit it from), your privacy rights, and how the law protects you.

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1. Important information and who we are

2. Purpose of this privacy policy

This privacy policy aims to give you information on how ACS Doha International School collects and processes your personal data through your use of this website, including any data you may provide through this website to express interest in ACS Doha International School or as part of the admissions process.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

This policy refers to "your" personal data but of course applies equally to any personal data in respect of your child that you may provide to us (and references to "your" consent, are references to the consent of the relevant parent or guardian with respect to any personal data relating to a student).

Data controller

ACS Doha International School is the data controller and responsible for your personal data (referred to as "ACS Doha International School", "we", "us" or "our" in this privacy policy). This company is registered in Doha, Qatar, under CR

number 50711, at ACS International School Doha, Building no 10, Street no 161, Area number/Zone 70, Al Kheesa, Qatar.

All staff at ACS Doha International School involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities. We have also appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Name: Salman Ahmad

Email address: sahmad@acsdoha.school

Postal address: Building no 10, Street no 161, Area number/Zone 70, Al Kheesa, Qatar.

Telephone number: +974 50981171

You have the right to make a complaint at any time to the National Cyber Security Agency, Doha Qatar for data protection issues <https://assurance.ncsa.gov.qa/>. We would, however, appreciate the chance to deal with your concerns before you approach the National Cyber Security Agency, Doha Qatar so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on April 21, 2024

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, marital status, title, nationality, date of birth, gender and familial relationships.

- **Education Data** includes things such as languages spoken, academic results and enrolment year.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, any services provided to you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us in respect of any services the school may provide, and your communication preferences.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Education, Contact and Financial Data by filling completing admission forms or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. How we use your personal data

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:

- **Consent:** when we have obtained your express consent – in writing, orally or through the validation of an option – and such consent is freely given, informed, specific and unambiguous.
- **Performance of a contract:** when the processing of personal data is necessary for the performance of your contract (including procedures to put the contract in place).
- **Legitimate interest:** when it is necessary for our legitimate interests (or those of a third party) and your interests. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Compliance with a legal obligation:** when the processing of personal data is necessary to fulfil a legal obligation which Qatar is subject to, such as reporting to administrative, judicial or other law enforcement agencies.

Purposes for which we will use your personal data

Personal data will be processed in a lawful, fair and transparent manner for the following purposes:

- To process the application and admission of students.
- For child protection, safety and security.
- For academic and pastoral monitoring.
- To manage health care of students.
- For investigating concerns regarding education and methods.
- To plan education provision.
- To inform students' families of news and events.
- For responding to requests from staff and students regarding their time at ACS Doha International School.
- To fulfil tax obligations.
- To answer questions and enquiries.
- To manage billing and accounting.
- To prevent fraud and other prohibited or illegal activities.
- To protect the security of our website including all personal data collected, and our educational services.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. We will not send you direct marketing communications unless we have obtained your explicit consent to do so. You must also be able to withdraw your consent. Such consent must be:

- **Explicit and unambiguous:** ACS Doha International School will include appropriate consent notices on the particular web page or form that requests consent specifically for direct marketing communications.
- **Opt-in and not opt-out:** You will be required to provide consent through clear affirmative action. We will not attempt to obtain indirect consent, such as via pre-ticked boxes or seeking initial consent via opt-out notices.
- **Easy to withdraw:** we will indicate clearly how you can withdraw your consent, and thus stop receiving direct marketing messages from ACS Doha International School unless you provide explicit consent to receive such marketing again.

ACS Doha International School will not buy email lists or any list containing personal data (whether anonymised or not). This includes contact information with the aim of sending direct marketing communications without obtaining explicit consent to such communications.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

ACS Doha International School will not, subject to the exceptions stated below, share your personal information with any third party other than a member of the Artemis Group without your prior consent, unless required by law. We will never pass on, sell or swap personal data for marketing purposes to any third party other than a member of the Artemis Group and personal data will be only shared internally for the purpose of delivering educational services.

Personal data may be shared externally with certain recipients, for example: other educational establishments that a student may attend after leaving ACS Doha International School, the Ministry of Education, Qatar and other government organizations, and providers of IT hosting and information systems that are necessary for the school to deliver its services. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes in accordance with our instructions.

6. International transfers

Personal data may be transferred to organisations outside the country for student applications for college or university. Various teaching and learning applications are also used that are based outside the country. We may also share your personal data within the Artemis Group, which may involve transferring your data outside the country. ACS Doha International School ensures that organisations outside of Qatar which receive, or process, personal data are compliant with Qatar's data protection regulations, or that a legal basis for transferring data, such as the explicit consent or the vital interest of the child, is met. Where this is not the case, the data is anonymised before transmission.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For example, we use cryptographic technologies for data confidentiality, protection mechanisms to prevent attacks, and access control mechanisms to permit only authorised access to your personal data. We also provide training on security and privacy protection for employees to raise their awareness on personal data protection. In addition, we limit access to your personal data to those employees, agents,

contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have procedures in place as part of our IT operating framework to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

For example: ACS Doha International School will retain accounting or tax data or data related to commercial accountancy books for ten years, depending on the laws in the jurisdiction in which the ACS Doha International School is located.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under data protection laws you may exercise the following rights:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some

cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us in writing at sahmad@acsdotha.school or at ACS International School Doha, Building no 10, Street no 161, Area number/Zone 70, Al Kheesa, Qatar.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We aim to respond to all legitimate requests within a month, and in many instances will respond sooner. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.