

## ACE OF BRUSSELS - PRIVACY STATEMENT

Last date of revision: AUGUST 2020

### WHO DOES THIS PRIVACY STATEMENT APPLY TO?

This Privacy Statement applies to the processing of personal data in the framework of the activities of international school ACE of BRUSSELS, a registered ASBL company (hereinafter: "the School").

We do everything that is possible to protect and process the personal data that are entrusted to us in a correct and transparent manner, in particular in accordance with the applicable law and more specifically the General Data Protection Regulation 2016/679 of 27 April 2016 ("GDPR").

**Please follow the links below for further information. Where relevant, we have made a distinction between website visitors, interested parents, and students, contact persons of suppliers, consultants or any other individual whose personal data are processed in the framework of our activities, job applicants.**

**What is covered by this Privacy Statement? For which purposes do we process personal data?**

- **I am a website visitor. I am an interested parent or student. I am a contact person of a supplier, a consultant or any other individual whose personal data are processed. I am a job applicant. What are the legal grounds for processing your data?**
- **I am a website visitor. I am an interested parent or student contact persons of suppliers, consultants or any other individual whose personal data are processed. I am a job applicant. Which rights do you have? How do we obtain your personal data?**
- **I am a website visitor. I am an interested parent or student. I am a contact person of a supplier, a consultant or any other individual whose personal data are processed. I am a job applicant. Which personal data do we collect?**
- **I am a website visitor. I am an interested parent or student. I am a contact person of a supplier, a consultant or any other individual whose personal data are processed. I am a job applicant. Who may we transfer your personal data to? Are your personal data protected? How long are your personal data retained?**
- **I am a website visitor. I am an interested parent or student. I am a contact person of a supplier, a consultant or any other individual whose personal data are processed. I am a job applicant. Are your personal data used for automated decision-making? How to contact us?**
- **Changes to this Privacy Statement**

## WHAT IS COVERED BY THIS PRIVACY STATEMENT?

With this Privacy Statement we would like to inform you about why and how we process your personal data as controller when we perform our activities or when you use the Site and the forms and applications on it, who we give this information to, what your rights are and who you can contact for more information.

When we refer to “the Site”, we mean the webpages commencing with the following URL: <https://www.aceofbrussels.com>

The Site may include links to other websites. Whilst we try to only provide links to sites that share our high standards concerning data protection, we are not responsible for the content and the policy concerning data protection of these websites. This Privacy Statement only concerns data collected by the School.

When clicking on links on the Site, we strongly recommend you to first read the Privacy Statement on the relevant websites before disclosing any personal data.

Be aware that when you visit our pages on LinkedIn, Facebook, Instagram, Twitter, Pinterest or Google for Business, whether or not via the link on our website, cookies are being processed by those social network sites. Based on that, we can obtain more information - in a completely anonymous way - about the public who visits our social media pages. For more information about why and how personal data are processed in that framework, we refer to the Privacy Policy and the Cookie Policy on the website of these platforms:

- *LinkedIn:*

*Cookie policy:* <https://www.linkedin.com/legal/cookie-policy>

*Privacy policy:* <https://www.linkedin.com/legal/privacy-policy>

- *Facebook*

*Cookie policy:* <https://www.facebook.com/policies/cookies/>

*Privacy policy:* <https://www.facebook.com/about/privacy/>

- *Instagram*

*Cookie policy:* <https://help.instagram.com/1896641480634370>

*Privacy policy:* <https://help.instagram.com/155833707900388>

- *Twitter*

*Cookie policy:* <https://help.twitter.com/nl/rules-and-policies/twitter-cookies>

*Privacy policy:* <https://twitter.com/en/privacy>

- *Pinterest*

*Cookie policy:* <https://policy.pinterest.com/en/cookies>

*Privacy policy:* <https://policy.pinterest.com/en/privacy-policy>

## **FOR WHICH PURPOSES DO WE PROCESS PERSONAL DATA**

### **I AM A WEBSITE VISITOR**

We process your personal data for legitimate business reasons. These purposes include, but are not limited to: – the good organisation of our services; – dealing with enquiries, requests and complaints transmitted through online forms (the ‘new enquiry form’, etc.); – improving the Site’s performance and design.

### **I AM AN INTERESTED PARENT OR STUDENT**

We process your personal data for legitimate business reasons. These purposes include, but are not limited to: – management of applications; – invoicing and accounting; – the provision of information on our school and services; – the good organisation of our services; – dealing with enquiries, requests and complaints; – public relations; – respecting legal obligations.

### **I AM (A CONTACT PERSON OF) A SUPPLIER, A CONSULTANT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED**

We process your personal data for legitimate business reasons. These purposes include, but are not limited to: – supplier management; – order and supply management; – invoicing and accounting; – the good organisation of our services; – dealing with enquiries, requests and complaints; – dispute management; – public relations; – statistics and market research; – informing on and complying with the safety regulations which apply on our site when you visit it; – logistics: – respecting legal obligations.

### **I AM A JOB APPLICANT**

The purpose for processing your personal data is to register your application for an employment in our school, and, if this application leads to start our selection procedure, make a profile of you, meaning that we will process all the necessary data that is required for us to assess your job application in view of a potential recruitment. This assessment can also include an assessment by a third party.

In case of positive assessment and decision to hire, we will also process your personal data to prepare an employment contract.

In case of a decision not to hire you, we will retain your personal data for a period of time as well, in particular in order to be able to contact you if any future job opportunities would match your profile.

## **WHAT ARE THE LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA?**

### **I AM A WEBSITE VISITOR**

When you contact us through the online contact forms ('new enquiry form' or 'application form'), we ask for your free, informed, specific and unambiguous consent to process your personal data and those of your child.

### **I AM AN INTERESTED PARENT OR STUDENT**

When you provide us with the personal data of you and your child (e.g. by uploading these data through the 'new enquiry form' or the 'application form'), we ask for your free, informed, specific and unambiguous consent to process your personal data and those of your family members, including your child.

### **I AM (A CONTACT PERSON OF) A SUPPLIER, A CONSULTANT OR ANY OTHER INDIVIDUAL. WHOSE PERSONAL DATA ARE PROCESSED?**

We process your personal data for the above mentioned purpose and when necessary for the conclusion and the performance of contracts to which you are party, including (but not limited to) accounting, invoicing and deliveries; - when necessary for compliance with our legal obligations; - for the purposes of the legitimate interest of our company and/or of a third party, including (but not limited to) the smooth progress of our activities, the management of our safety regulations, supplier management, etc. and after balancing the interests. If you want more information about this, you can always contact us.

If we have the legal obligation to obtain your free, informed, specific and unambiguous consent to process your personal data for certain purposes (e.g. sending a newsletter or information about school events), we will only process your data for such purposes to the extent that we have obtained such consent from you.

### **I AM A JOB APPLICANT**

The processing of your personal data is necessary in order to take steps prior to entering into an employment contract and is in our legitimate interests, i.e. the interest to assess you before deciding on making an offer of employment, which is, according to us, also in your interests (or in any case this does not override our interest). Retaining your data for a period of time in order to contact you in case of any future opportunities is also in our legitimate interests.

## **WHICH RIGHTS DO YOU HAVE?**

You have several rights concerning the personal data we process about you or your child. In particular, you have the right to: - access your personal data or those of your child, and receive a copy of them; - ask that we update the personal data we hold about you or your child, or correct such personal data that you think is incorrect or incomplete; - ask that we delete your personal data or those of your child, or restrict the way in which we use

such data, if you believe that there is no (longer a) lawful ground for us to process it; - withdraw your consent to our processing of your personal data or those of your child (to the extent such processing is based on your consent); - restriction on data processing, if you would contest the processing or the correctness of the processed personal data, or if you wish to keep certain personal data in view of a possible legal claim, while the School no longer need the personal data for the purposes mentioned in this Privacy Statement; - receive your personal data or those of your child, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or the performance of a contract); - object to our processing of your personal data or those of your child for which we use legitimate interest as a legal basis, in which case we will cease the processing unless we have compelling legitimate grounds for the processing.

In order to exercise the above rights you can send an email to [info@aceofbrussels.com](mailto:info@aceofbrussels.com) or send a written request to ACE of BRUSSELS, Drève du Prieuré, Auderghem, 1160, Bruxelles

You may also use these contact details if you wish to make a complaint relating to the processing of personal data - [Principal@aceofbrussels.com](mailto:Principal@aceofbrussels.com)

If you are unhappy with the way we handle your personal data or those of your child, you have the right to file a complaint with the Data Protection Authority (In Belgium: Drukpersstraat 35, 1000 Brussels, tel +32 (0)2 274 48 00, email [contact@apd-gba.be](mailto:contact@apd-gba.be)).

## **HOW DO WE OBTAIN YOUR PERSONAL DATA?**

### **I AM A WEBSITE VISITOR**

We may obtain personal data about you when you use the Site and the applications offered on it, such as the 'new enquiry form', the 'vacancy application form' for job applicants or the 'application form' for students.

### **I AM AN INTERESTED PARENT OR STUDENT**

We will obtain your personal data because you give them to us e.g. in the framework of conversations and contacts, by filling in a contact or application form on our website.

When we obtain your personal data from other parties (such as former schools). We make reasonable efforts to enter into contractual clauses with these parties obliging them to respect the data protection legislation. This can be done by obliging this party to provide you with all necessary information or, if necessary, to obtain your consent for processing the personal data as described in this Privacy Statement.

### **I AM (A CONTACT PERSON OF) A SUPPLIER, A CONSULTANT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED**

We may obtain personal data about you in the framework of the execution of our activities.

We may obtain such personal data because you give them to us e.g. via the Site, by contacting us, by registering yourself when you enter the School, etc., because others give them to us e.g. service providers we rely on in the framework of our activities, or because they are publicly available.

We may further also obtain personal data from you by the way you interact with us.

When we obtain personal data from external parties, we make reasonable efforts to enter into contractual clauses with these parties obliging them to respect the data protection legislation. This can be done by obliging this party to provide you with all necessary information or, if necessary, to obtain your consent for processing the personal data as described in this Privacy Statement.

### **I AM A JOB APPLICANT**

We obtain your personal data because you give them to us.

## **WHICH PERSONAL DATA DO WE COLLECT?**

### **I AM WEBSITE VISITOR**

The main personal data which we collect via the Site, relate to the following services:

#### **New Enquiry Form**

You can fill in the New Enquiry Form on the Site to obtain more information, to ask questions or also to receive advice. We process in this context the following data regarding the parent: name, email address and phone number, date you would like to visit the school, where you heard about the School, and any additional information that you would like to add. We process the following data regarding the child: name, date of birth, mother tongue, name of current school (if applicable).

#### **Application Form**

Via the 'application form' on the Site, you can apply for a place for your child at the School. In this context, we ask you to upload the following details of the child: first name, middle name and last name, data of birth, gender, anticipated start date, place of birth, nationality, mother tongue, other languages then at home, any medical details relating to your child, any other details about your child that we should know about. Furthermore, we ask you to fill in the following information: contact details of the family members, details of the child's current school, details of parent employer, details about the payment of the school fees.

#### **Vacancy Application Form**

Via the Vacancy Application Form on the Site, you can apply for a job. We process in this context the following data: your name, your address, your email address, your telephone number, if you are eligible to work in the EU, the position you are interested in, your possible interest for a temporary position, your availability for supply work, and the way you heard about the School. Furthermore, we ask you to upload the following documents: CV, scans of certificates including qualified teaching status certificate if you are applying for a teaching post, and criminal records check.

### **I AM AN INTERESTED PARENT OR STUDENT**

We process any personal data that you present us with as part of your application or request for information, including the data uploaded through our online New Enquiry Form or the application form.

### **I AM (A CONTACT PERSON OF) A SUPPLIER, A CONSULTANT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED**

The personal data that we collect may, among other things, include: - standard identification data and contact details (e.g. name, address (private/work), phone number (private/work), email address (private/work)); personal characteristics (e.g. age, gender, date of birth, place of birth, nationality, language); financial specifics (e.g. bank

account number); your picture if you enter our site as driver; employment data (e.g. the organisation you work for, your job title...); data you transmitted via forms (e.g. contact forms) and all other possible services and communication channels we offer; data about the products and services you desire; data about how you use our products and services; – data you provide us with when you show interest in our products and services; data about how you interact with us and other similar information.

## **I AM A JOB APPLICANT**

As mentioned above, you can apply via the 'vacancy application form' on our website.

For the purposes of our recruitment and selection procedure, the processing of personal data may further include the following: standard data related to your identity (name(s), first name(s), address; personal data (date and place of birth, nationality, gender, phone number, email address, hobbies and interests; your picture if you provide it to us voluntarily; data with regard to your professional experience (profile, data on previous employers, termination of last employments and work carried out, special projects), including reference checks if you have provided us with references in your CV; data with regard to your education (diplomas, certificates, internships, special trainings); language knowledge; if applicable, whether or not you possess a work and/or residence permit for the European Economic Area (EEA); any other personal data that you present us with as part of your application, in your CV or motivation letter, related to the exercise of the role; digital assessment through the internet (social media presence), insofar as this presence is open for us to see; any other personal data (than mentioned above) that require processing by virtue of the law. You are not required to provide us with these data. However, not doing so might adversely affect your chances of being hired.



## **WHO MAY WE TRANSFER YOUR PERSONAL DATA TO?**

We may transfer your personal data to third parties who we believe reasonably need access to these data with a view to the achievement of one or more of the purposes mentioned above. This may include the following third parties: external service providers we rely on for various business services, as for example IT support, software, insurance, surveillance; other schools; law enforcement and government authorities in accordance with the applicable legislation; external professional advisers (e.g. lawyers or consultants of the School).

Most of the processing of your personal data will not involve any transfers outside the European Economic Area (EEA). However, it could be necessary that a third party supplier or another school located in a third country outside of the EEA needs access to your personal data to process and/or store them. In such cases, the School will adopt appropriate safeguards in line with the GDPR to ensure that your personal data are processed in accordance with the principles, unless this would not be required because a specific exception applies. For more information about the possible data transfers outside of the EEA and the appropriate safeguards in place, you can contact [info@aceofbrussels.com](mailto:info@aceofbrussels.com).

## **ARE YOUR PERSONAL DATA PROTECTED?**

We employ strict technical and organisational security measures to protect your personal data from access by unauthorised persons, against unlawful processing, abuse, damage, loss and destruction both online and offline.

These measures include among others: instructions and training to relevant staff to ensure they are aware of our data protection obligations when they are handling personal data; organizational and technical restriction of the access to personal data on a strictly 'need to know' basis, and monitoring thereof; technological security measures, including passwords, fire walls, anti-virus software and encryption; physical security measures, such as access control to the School premises.

Although we take appropriate security measures once we have received your personal data, the transmission of data especially over the internet (including by email) is never completely secure. We endeavour to protect your personal data, but we can never fully guarantee the security of the personal data transmitted to us or by us.

We limit access to your personal data to people who we believe reasonably need access to that information in order to carry out their jobs.

## **HOW LONG WILL YOUR PERSONAL DATA BE RETAINED?**

### **I AM A WEBSITE VISITOR**

Your personal data will not be retained longer than necessary for the purposes described above.

As a general rule, personal data obtained through the contact forms on our websites are stored for a period of 5 years after our last contact. Your personal data could be removed earlier if you unsubscribe from our newsletters, if you request to be removed from our system or if you otherwise withdraw your consent.

Depending on the specific situation, we may however retain your personal data for a longer period. This will in particular be the case if any of the following periods is longer: (i) as long as is necessary for the involved activity or service; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise.

### **I AM AN INTERESTED PARENT OR STUDENT**

We will only hold your personal data for as long as it is necessary for the purposes mentioned above. In case you decide not to apply for a place for your child at the School, in case your child is not admitted at the School or in case you decide not to accept an offer for a place for your child at the School, your personal data and those of your child are deleted immediately.

If you have subscribed for our newsletter or other information e-mails about the services and events of our school, your personal data are stored for a period of 5 years after our last contact. Your personal data could be removed earlier if you unsubscribe from our newsletters, if you request to be removed from our system or if you otherwise withdraw your consent.

If you accept an offer of a place for your child at the School and the enrolment has been registered, the School's Data Retention Schedule for Parent and Child Data will be applicable.

Depending on the specific situation, we may however retain your personal data for a longer period. This will in particular be the case if any of the following periods is longer: (i) any retention period that is required by law; or (ii) the end of the period in which litigation or investigations might arise.

### **I AM (A CONTACT PERSON OF) A SUPPLIER, A CONSULTANT OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED**

As a general rule, your personal data are stored for a period of 7 years as of the end of the contractual relationship.

Email traffic is, in principle, stored for a period of 30 days on our server and back-ups during a period of 3 years.

Depending on the specific situation, we may however retain your personal data for a longer period. This will in particular be the case if any of the following periods is longer: (i) as long as is necessary for the involved activity or service; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise.

## **I AM A JOB APPLICANT**

We will only hold your personal data for as long as it is necessary for the purposes mentioned above. In case the recruitment does not result in an employment relationship, your personal data will be retained for a period of at maximum two years after the end of the job application procedure for the purposes described above.

## **ARE YOUR PERSONAL DATA USED FOR AUTOMATED DECISION-MAKING?**

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals involved.

As a rule, your personal data will not be used for automated decision-making. We do not base any decisions about you solely on automated processing of your personal data.

## **HOW TO CONTACT US?**

If you have any questions about this Privacy Statement and this Site in general, you can contact us: by emailing us at [info@aceofbrussels.com](mailto:info@aceofbrussels.com); by calling to: 0032 (0)2 420 02 04; by sending a written request to ACE of BRUSSELS, Drève du Prieuré 19, Auderghem, 1160 Bruxelles.

## **CHANGES TO THIS PRIVACY STATEMENT**

We may modify this Privacy Statement from time to time. To let you know when we have revised the Privacy Statement for the last time, we will amend the revision date at the top of this page for each modification. The modified Privacy Statement will then be applicable as from this date.

Please frequently consult this page in order to be informed of changes and additions.