



## Translation Privacy Statement SPO Utrecht

The International School Utrecht is governed by two collaborating school boards: SPO Utrecht and NUOVO. Please find below the translation of the Privacy Statement (In Dutch Privacyverklaring), recently published by SPO Utrecht.

SPO (Stichting Openbaar Primair Onderwijs) Utrecht takes privacy seriously and is aware of the current privacy legislation. SPO Utrecht is the board of 36 public schools in the city of Utrecht. More than 10,000 pupils attend our schools. We are also employer of more than 1000 employees. This means that SPO Utrecht processes a huge amount of personal data. SPO Utrecht is, under the terms of the General Data Protection Regulation (GDPR), ultimately responsible for the careful processing of all these personal data. This must be done carefully, because abuse of personal data can cause great damage to students, employees and other parties involved at SPO Utrecht, and also to the image of SPO Utrecht itself.

We would therefore like to explain in this privacy statement how SPO Utrecht handles personal data.

*NB: Where we refer to SPO Utrecht, we mean the entire organisation: including all 36 schools and our board office.*

### **I For what purpose do we process personal data?**

SPO Utrecht processes personal data to achieve the following goals:

- The organisation of the school and education, the supervision of pupils, the provision of their support needs and the provision of school advice;
- Providing teaching materials, or making them available;
- Monitoring safety within the school and on the school grounds, protecting property of employees, students and visitors;
- The publication on the website of information about the organization, teaching materials, the school and the pupils;
- The publication of all kinds of activities of the organisation or the individual schools, for example on the SPO Utrecht website, in brochures, in the school guide or via social media;

- Calculating and paying salaries (including handing over claims to third parties);
- Calculating and collecting the voluntary parental contribution, for example for learning materials and extracurricular activities (including handing over claims to third parties);
- Facilitating Division Council activities, Division Council and Parent Support Group, including facilitating the elections for these bodies;
- Applying for funding and carrying out audits;
- Maintaining contacts with former pupils and employees;
- Engaging and executing employment contracts, cooperative relationships with contractors and contracts with suppliers;
- The implementation of legislation and regulations;
- Conducting legal proceedings involving SPO Utrecht.

## **II On what legal basis do we process personal data?**

We only process personal data if there is a legal basis for this. The processing of personal data is done by SPO Utrecht only if one of the following conditions is met:

- The processing is necessary for the fulfillment of a task of general interest or of a task in the exercise of the public authority that is assigned to us;
- The processing is necessary to comply with a legal obligation;
- The processing is necessary for the execution of an agreement in which a party involved is involved or, at the request of the person concerned, to take measures before the conclusion of an agreement;
- The processing is necessary for the representation of the legitimate interests of (a school of) SPO Utrecht or a third party, except when the interests or fundamental rights and the fundamental freedoms of the person concerned weigh more heavily;
- The processing is necessary to protect the vital interests of a data subject or another natural person (vital interest);
- The subject has given permission for the processing of his personal data for one or more specific purposes; this permission can be withdrawn at any time, or can still be given.
- Some personal data processed by us are special personal data. You can, for example, think of health data that is necessary to adequately support a pupil or employee. These personal data may only be processed under specific conditions.

## **III Which personal data do we process?**

We need various personal data to be able to comply with our legal obligations, to provide appropriate education and to be able to fulfill all the other objectives mentioned above. A great deal of personal data is provided by parents themselves (such as when registering at school). Teachers and support staff also record all kinds of data about pupils (for example, figures and progress). Personal (special) personal data are also processed by all employees

themselves. These data will often themselves be provided to us by us (for example during the employment) and we will also record other information about them (such as the appraisal and performance reviews).

## **IV With whom do we share personal data?**

Sometimes we also provide personal data to other organizations. This must then fit our purposes and there must be a legal basis to provide these data.

As an example, there are suppliers who process personal data on our instructions. You can think of suppliers of an administration system, a pupil tracking system and suppliers of (digital) learning tools. Agreements have been made with such suppliers ('processors') to properly protect and secure the personal data concerned.

We also share personal data with other organizations. Organizations such as the Samenwerkingsverband Utrecht PO, the truancy officer, the institutional accountant, the Inspectorate of Education, the municipality of Utrecht and the Ministry of Education, Culture and Science (DUO). Of course, this only happens to the extent necessary, and if there is a specific basis for sharing data. In many cases, we will be legally obliged to share personal data with these organizations. If this is not the case, permission from the pupil's legal representative is usually required in advance to share the personal data.

We will never share personal data with commercial third parties for purposes other than those stated in this privacy statement.

## **V How long do we retain personal data?**

SPO Utrecht does not store personal data for longer than is necessary for the purpose for which this data is processed, unless it is required to keep the data for longer under national laws and regulations.

## **VI What rights can those involved exercise?**

You can exercise the following rights, regarding data:

- Get an explanation of what personal information we collect from you as a data subject and what we do with it
- To receive access to these personal data
- Correcting mistakes in personal data
- Removing (for example) outdated personal data
- Withdrawing permission for the processing of personal data, if the processing is based on it on this permission - object to the use of personal data, especially if you feel that we are insufficient have an interest in processing this data

- Limiting the processing of your personal data, if you have made a request for correction, or objected or if you believe that we are processing your personal data unlawfully. Persons of 16 years and older exercise these rights independently. For children under 16, the above rights are exercised by their legal representative (s). Do you want to appeal to the above-mentioned rights? Please direct your request in the first instance to the director of the school (when it concerns pupils and their parents / guardians) or your supervisor (if you are an employee). After you have submitted a request and assessed will take place to see whether your request can be met. We adhere to the legal requirements.

## **VII Do you have questions or complaints?**

Do you have any questions? Then you can always contact the head of school (for students and their parents / caregivers) or with your supervisor (if you are an employee). You can also contact our Data Protection Officer. Please address your request to this official via [privacy@spoutrecht.nl](mailto:privacy@spoutrecht.nl) or use the telephone number: 030-26 52 640.

Do you believe that we do not act correctly or have acted incorrectly? Then you can appeal to the general complaints procedure of SPO Utrecht. You can also turn to the National Complaints Committee for Education (*Landelijke Klachten Commissie Onderwijs*) or the Authority for Personal Data.

## **VIII Contact details:**

SPO Utrecht has a Data Protection Officer. You can contact this person via [privacy@spoutrecht.nl](mailto:privacy@spoutrecht.nl) or 030-2652640.

*This statement was last modified in May 2018.*