

# **Privacy Policy**

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#### **Collection of Personal Data**

Personal data provided by you to Clarence International School (CIS) and Clarence Education Limited (CEL) is used by the school to perform its administrative and educational functions. CIS generally collects personal data through the CIS application forms, Google Forms, surveys and/or other channels. In addition to the members of the CIS community, we may also collect personal information within the range stipulated by law from publicly available sources. CIS will comply with all related laws regarding personal information.

# **Data Collected**

The types of data we collect may include, but are not limited to:

- 1. Student and Parents/Guardians' Name
- 2. Address
- 3. Birthday
- 4. Gender
- 5. ID/Passport details
- 6. Medical records & reports
- 7. Nationalities
- 8. Marital status
- 9. Phone number
- 10. Bank account payment and credit card information that is specified in connection with billing for tuition fees, etc.
- 11. Future enrollment or graduate school name
- 12. All information other than the above to identify you (including video, audio, etc.)
- 13. Attendance status of lessons
- 14. Assessment, etc.
- 15. Information on aspiring schools, examination schools, and entrance schools
- 16. Past and current academic records such as schools attended, courses of study, periods of study and academic results
- 17. Parents/Guardians' employment information such as company name, company type, sector, designation, business telephone numbers and email addresses
- 18. Images, documents, photographs, videos (permission to use images, documents, photographs, videos of pupils for the school's publicity purposes, including the website, is sought when they join the CIS community).

In addition to the above, all or part of the information that cannot identify you, but that can identify a particular individual by collating it with other information, will also be regarded as personal information.

#### Use of Data

CIS will use your data for the following purposes, including, but not limited to:

- Enrolment-related purposes (admission assessment, registration, planning of curricula, communication with students and parents, provision of references, pastoral care, extracurricular activities and provision of healthcare services)
- Employment-related purposes (appointment administration, human resource management matters including payroll, leave and benefits administration and staff development)
- Calculating statistical metrics relevant to the performance of CIS
- School operation related purposes, including where appropriate, marketing, document management, assessment and reporting
- Regulatory compliance related purposes, including where necessary, provision of data to government education authorities
- All other matters relating to the mission, function or operation of CIS as CIS may consider to be necessary or appropriate.
- When there is a request from related ministries and agencies based on laws and regulations
- When we determine that it is necessary to protect the life, body or property of our company, our community or third parties

## Safeguarding and Child Protection

In accordance with Child Welfare Act (Article 29) and Abuse Prevention Act (Article 13-4), CEL and CIS staff members will comply with all requests for information or pupil contact from Child Welfare Centres or other child protection related external agencies.

## Storage of Data

Personal data will be kept confidential and handled by CIS staff members. We take necessary and appropriate measures for the safe management of personal information, and maintain and improve the safety measures within a reasonable range so as to restrict access to your information by a third party.

CIS may disclose personal data collected for the purposes above to the following entities:

- 1. Entities to whom CIS is compelled or required to do so under law or in response to a request by a government agency
- 2. Third party schools seeking the pupil's academic references, in each case whether in Japan or overseas
- 3. Entities considered by CIS to be necessary or appropriate in order to support the enrolment, education and wellbeing of CIS pupils as well as for the operation of CIS
- 4. When we determine that it is necessary to protect the life, body or property of our company, our community or third parties
- 5. If CIS has the prior consent from the member(s) of our community whose personal data is to be disclosed

In the cases above where we entrust a third party to handle the personal data, we will conclude a confidentiality agreement with the outsource, confirm the safety of the information management system of the outsource, and perform necessary and appropriate supervision to enforce the agreement.

# **Accessing and Collecting Data**

All reasonably practicable steps will be taken to ensure that the data held by CIS are protected against unauthorised or accidental access, collection, use, disclosure, copying, modification, disposal or similar risks. In addition, the Company will continue to provide education on the protection of personal information to all employees, and practise the proper handling of personal information. All personal data you provide to the school are secured, and access to them is restricted to authorised personnel only.

# Request for Disclosure and Updating of Personal Information

Parents/Guardians may request disclosure of personally identifiable information that we collect and store (but only for the personal information of the claimant). If the content of personal information managed by CIS is different from the fact, we will respond to requests for correction or deletion. If you wish to amend or update the personal information you have provided CIS, please contact the school administration team with your request.

#### **Publication and Change of Privacy Policy**

We publish and announce our privacy policy on our website (www.clarenceschool.jp). We may also change our privacy policy as needed. In this case, we will publish an updated version and inform the CIS community accordingly.

# Website

All material on our website(s) is protected by copyright under worldwide copyright laws. While you may download on your computer or print a copy of the material on our website(s) for your own personal use you may not reproduce, sell, publish, distribute or reprint for any commercial purpose without the express permission of CIS. Requests to use images should in the first instance be addressed to office@clarenceschool.jp.

# **Online Data Protection**

When you visit the CIS website, non-personally identifiable data about you is automatically detected and logged by our servers. Typically, this will include your domain name and country, the page(s) visited, search terms and search engines employed and the web browser used. This information is used by us solely to monitor usage of our website and to find ways of improving it. It is never passed or sold to any third party. We use online forms to enable interested parties to sign up for different programmes. All personal information submitted in these forms is treated in strict confidence, and is processed in accordance with related legislation in force from time to time.

# **Links to Other Websites**

CIS accepts no responsibility for the content of third party sites linked to or by our website(s), which you view at your own risk. While every effort is made to check these sites on a regular basis to ensure that they are relevant and appropriate, linkage does not imply any endorsement of such sites.

# Information security

CIS will use appropriate technical and organisational measures to keep personal data secure, protect against unauthorised or unlawful processing and/or accidental loss, destruction or damage.

# Retention of personal data

Personal data will not be retained for any longer than necessary. The length of time over which data will be retained will depend upon the circumstances, including the reasons why the personal data was obtained. Personal data that is no longer required will be deleted permanently from our information systems and any hard copies will be destroyed securely.

#### Data breaches

CIS will:

- investigate any reported actual or suspected data security breach;
- notify the affected individuals if a data breach is likely to result in a high risk to their rights and freedoms.