

Policy of Use of Images and Recordings of Students by the School

1. Introduction

This Policy of Use of Images and Recordings by the School establishes the framework in which the American International School of Zagreb (“AISZ” or “school”) may take and use the photos or recordings of its students for the purposes listed below.

1.1. Promotional

The school may wish to photograph, film or record students for certain events within the context of their school education. These images may be used in printed or online publicity materials, including school brochures, newsletters (for both current students and alumni) or other publications, on the school’s website, on the school’s social media platforms or around campus. The school may also use video footage or web camera recordings during inter-school conferences or educational projects.

From time to time the campus may be visited by the media who could take photographs, film footage or make recordings. Students may appear in these images which may be issued in local, national and international newspapers and televised or broadcasted news programs. The school is responsible for authorizing this and the media will not be invited in if the school feels their presence is inappropriate.

1.2. Grading and educational purposes

Video recordings of student’s performance of exercises during their sports and athletics education for the purpose of grading may be used when such video recordings are necessary to adequately assess a student’s performance (e.g. in the context of IB program). These images and videos shall remain with the school and will be erased at the conclusion of the educational unit or grading unless otherwise notified.

1.3. Yearbooks

Photos of students enrolled in the current school year and their names and grades are processed in tools which are then printed in book form. At the end of each year, AISZ gives yearbooks in printed book form to students as memory books.

1.4. Student ID cards (physical and digital)

Photos of students enrolled in the current school year and their names are processed for creating physical school ID cards carried by the students, with the purpose to keep a safe environment for them in the school. School ID cards help the school’s staff to control entrance and exit from the school’s premises and surroundings and decrease exposure of students, parents, employees, and other visitors to the school to robberies, burglaries, violence, theft and similar events.

Photos of students enrolled in the current year are also uploaded to their profile in school information systems to which AISZ staff and parent of the student have access. It is necessary for AISZ to have these photos uploaded so that AISZ staff can always easily identify a student during everyday operations and learning processes.

2. Lawful basis for processing

Whenever images and video recordings reveal student's identity, the legal basis that allows AISZ to take and use the images or recordings of students consists in the consent that the parents / legal guardians have granted in the school information system or in another suitable manner.

Nonetheless, AISZ may use the photographs or video recordings of students, without the prior consent of parents/legal guardians, in the school's legitimate interest, when video recordings are necessary for video surveillance thus ensuring the security on campus.

The conditions of use of images and recordings of students are:

- Personal details, full names (first name and surname) or other elements which may lead to the identification of the student will not be disclosed on picture or alongside a picture or recording. The condition described above shall not apply to the publication of images in the AISZ Newsletter, Yearbook and School ID or specific cases with explicit parental consent.
- Personal details such as email addresses, postal addresses, and telephone or fax numbers will not be disclosed.
- The school will only use pictures of appropriately dressed students.
- The permission to use images or recordings is for the period during which the child is a student of AISZ. After a student leaves AISZ, images and recordings will be deleted immediately unless they hold specific value for the school, are needed under AISZ legal obligations or if consent is provided.
- Group photos on which data subject cannot be identified will not require the consent.
- The school will ensure that electronic images are stored on a secure network that cannot be accessed by members of the public.
- The school will not sell images or recordings to third parties without prior parental consent.
- The school will not pay students for images or recordings.

2. Rights related to the use of images and recordings by the school

With regard to the use of images and recordings as described in this Policy, parents and students that present an appropriate level of understanding, have certain rights derived from the data protection applicable regulations.

We refer here especially to the following rights that are most probably to be exercised regarding the use of images and recordings:

- The right to withdraw the consent given for the use of images at any time. Please note that in this situation, the processing of personal data performed prior to such withdrawal will not be affected.
- Right of erasure, which applies in the following situations:
 - Where the photos and recordings are no longer useful and do not serve the initial purpose and other lawful purpose exists;
 - Where the consent given to processing images by the school was withdrawn, provided that the school cannot justify other legal basis for processing;
 - Where the photos and/or recordings were unlawfully processed;
 - Where the right to object was successfully exercised;
 - Where erasure is required by a legal provision applicable to the school.

Given the fact that photos and recordings are considered personal data, all the rights provided under the Privacy Notice shall apply accordingly. In this respect, please consult the Privacy Notice.

AISZ shall store the images and recordings of students for as long as they serve the purposes for which they were initially taken.

3. Use of camera phones and other recording devices by others

AISZ staff and students take photographs and videos throughout the school year to record and share everyday life at AISZ. These images may be shared internally, as well as on secure digital platforms (e.g.: AISZ school information system, Google Services or SeeSaw). As a way of documenting and sharing their learning story as positive digital citizens, AISZ staff and students may share these images on social media platforms, including Facebook, Instagram, YouTube and Twitter.

Visitors will be advised not to use their camera on their personal phones while at the school and where possible, will be accompanied by a staff member for the duration of their visit. Students are not allowed to use any kind of personal mobile phone (camera phone or not) during school time, usage before and after school is permitted.

Where parents or family of students or students take photos or videos of other students on school premises or in the context of various school events or activities, for purely personal, household or recreational purposes, this policy shall not apply and the school shall not bear any responsibility with regard to the use of those photos or videos.

The school hereby kindly requests parents to use all images and video taken as described above with maximum regard to the rights and liberties of other persons, especially children appearing in those photos or videos.

Where students or parents will take photos or videos for official use of the school, AISZ shall take care that these photos will be handled and used according to this Policy.

The school shall update this Policy every 3 years, in order to ensure its compliance with evolving technology and changes with respect to the data protection regulatory framework.

Approved	May, 2018
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Reviewed	December, 2021
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