

## PRIVACY NOTICE ON PROCESSING PERSONAL DATA IN AISZ

The American International School of Zagreb, Ulica Damira Tomljanovića Gavrana 3, Zagreb, Croatia ("we "or "AISZ ") wishes to be completely transparent regarding the processing of personal data according to the General Data Protection Regulation no. 679/2016 applicable in the European Union ("GDPR") and therefore, we have presented below all the information you may need on this subject matter. Please read this privacy notice to understand the data processing operations carried out by AISZ.

This Notice is designed to help you understand how we handle your data **as a prospective or current student, parent or legal representative, alumni (former student), job applicant, employee, former employee, or business partner**. We want you to feel informed and empowered about your privacy rights and choices. Please take a moment to familiarize yourself with our practices outlined here.

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### INTRODUCTION

This Notice refers to the processing of personal data collected and processed by AISZ. We consider ourselves a data controller, meaning that we decide how and why we shall collect and further process your personal data, i.e., we establish the purposes and means of processing it.

In accordance with the GDPR, the terms in this Notice have the following meaning:

"**personal data**" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**"processing"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**"controller"** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**"processor"** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**"recipient"** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be following the applicable data protection rules according to the purposes of the processing;

**"third party"** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

**"consent of the data subject"** means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. For individuals under the age of 18, consent is provided by their parents or legal representatives. For individuals aged 18 or older, consent is provided directly by the individual.

**"personal data breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

**"parent"** refers to individuals who act as students' legal representatives, including biological or foster parents, legal guardians, and custodians.

The processing of personal data on prospective and current students and their parents or legal representatives is a part of AISZ's everyday operations of providing educational services by AISZ. When we use the term "parent", the term refers to both biological or foster parents, legal guardians, and custodians. As most of the students are below the age of 18, consent for students as data subjects is given by their parents. If a student is 18 or older, consent is given by the student. Therefore, whenever in this Notice we refer to parents' consent, reference to parents' consent should be read as a reference to the consent given by the student who is 18 or older.

Please note that communication, whether expressly stated or reasonably assumed to achieve a specific purpose of personal data processing, may include electronic communication tools such as Google Workspace, Gmail, Chat, Google Meet, Google Drive, and other appropriate and well-established tools.

## **YOUR PERSONAL DATA AT AISZ AND HOW WE USE IT**

### **IF YOU ARE A PARENT**

AISZ might collect the following **categories of parents' personal data**:

- Identification information: Name, surname, personal identification number, photograph for the ID Card, license plate number, legal documentation indicating proof of guardianship;
- Contact information: Address and e-mail address, phone number, and contact information for emergency purposes;
- Employment information: Place of work and position;

- Financial data: Financial aid information (such as salary information, other data required to evaluate eligibility for financial aid), payment data:
- Educational information: Educational and professional background information.
- Video recordings: CCTV video recordings that may contain personal data are taken when entering or while on the school premises.

AISZ collects and processes **parents' personal data for various purposes:**

**Application for Admission.** AISZ evaluates each student's admission application, processing parents' identification and contact information in school systems to fulfill enrollment requirements or pre-contractual steps.

**Payments and Financial Aid.** AISZ processes certain parents' personal data under the enrollment contract. This data includes identification information, bank account details, and other relevant financial information disclosed during application fee and tuition payments. Employment data may also be processed if the employer contributes to tuition. For parents applying for financial aid, AISZ may additionally process data on personal financial circumstances, personal identification number, employment information, and educational and professional background. This data may be transferred to a web-based service provider in the USA operating a standardized tool we use in this process. In all cases, AISZ relies on the legal basis of contract performance (enrollment contract) to process parent data within the school information systems.

**Databases of All Applicants.** To manage applications quickly and efficiently, and based on legitimate interest, AISZ processes parent data collected in the stages mentioned above of the admission process within internal databases.

**Enrolment Contract Execution.** AISZ needs to use parents' personal information to provide education and other services to their children as per the enrollment contract. This includes administrative tasks, communicating with parents, organizing meetings, sending invoices, and keeping payment records. AISZ will also communicate with parents before and during enrollment and address their questions and requests. Additionally, AISZ offers parents parking reservations and asks for their license plate numbers. AISZ processes this data for contractual obligations or pre-contractual measures.

**Emergency Pack.** AISZ keeps emergency contact details for quick parent notification during student emergencies. This information is in an "Emergency pack" file with student and parent contacts. Responsible AISZ staff can access it during urgent situations to protect vital and legitimate interests.

**Security Measures.** AISZ uses parental data for security protocols, including video surveillance and identity verification and photograph for the ID Card to safeguard the school environment and community members aligned with legitimate interests.

**Communication and Engagement.** To enroll students in sports competitions locally and internationally, AISZ shares parents' contact details with organizers to complete the registration process. AISZ also gathers student stories and experiences for newsletters sent to parents, for which it collects and processes parents' identification and contact information. For all these purposes, AISZ handles parents' personal data based on their individual consent.

## IF YOU ARE A STUDENT

AISZ might collect the following **categories of students' personal data:**

- Identification information: Name, surname, Croatian Personal Identification number (OIB), gender, date, place and country of birth, citizenship, residence, other ID document data, copy of passport or ID card;
- Contact information: Address, e-mail address, and information of external referees or physicians.
- Information on academic achievements: Information on education, grades, attendance, learning outcomes, test and sports results, special knowledge, skills and competencies, other information

provided during the admissions process, other documents (for example, diplomas, certificates and similar) etc.

- Medical data: Psychological/behavioral evaluation, medications used, medical records, allergies, special needs and learning disabilities, vaccination certificate, vaccination booklet or equivalent vaccination records, copy of doctor's certificate that the student is ready for school.
- Images and video recordings: Individual and group photos and videos of students, including CCTV video recordings.

AISZ collects and processes **students' personal data for a range of purposes:**

**Application for Admission.** AISZ reviews student applications for school admission. To do this, AISZ gathers student information like name, birth details, contact info, academic records, and readiness for school as confirmed by a doctor's certificate. This data is processed in school systems to fulfill enrollment requirements or pre-contractual steps. AISZ may ask parents for vaccination records for safety reasons and based on legitimate interest. AISZ also stores student passport copies and photos for identity verification, requiring parent/guardian consent before processing this data.

**Databases of All Applicants.** To manage applications quickly and efficiently, AISZ processes students' data collected during the application for admission in the internal databases. If a student is not accepted or enrolled, AISZ keeps only their identification data and a note on what caused the application process to end to give special attention if they reapply. AISZ processes students' data based on our legitimate interests.

**Emergency Pack.** AISZ keeps emergency contact details for quick parent notification during student emergencies. This information is in an "Emergency pack" file with student and parent contacts. Responsible AISZ staff can access it during urgent situations to protect vital and legitimate interests.

**Providing Education, Student Registry and Administration.** To manage student records such as enrollment, grades, and learning progress, AISZ collects and handles students' identification details, academic achievements, attendance, and other relevant information. Keeping these records organized is crucial for daily operations, scheduling classes, appointments with parents, and other student activities. AISZ processes this student data in its school systems to fulfill enrollment contracts. AISZ may also back up student data using other tools for its legitimate interests when needed.

**Security Measures.** To enhance safety and security at the school, AISZ uses video surveillance and student identification cards to monitor entrances and exits and deter theft and violence. AISZ processes students' CCTV video recordings and photos on identification cards for safety reasons based on legitimate interest. Security measures also include ICT security measures to prevent unauthorized access and cyberattacks, which involve processing students' names, surnames, and e-mail addresses for safety purposes and based on legitimate interests.

**Safeguarding And Medical Office Services.** Depending on students' needs, AISZ's counselors offer emotional and social development support, which greatly impacts learning outcomes. Additionally, AISZ's medical office provides basic medical assistance to students. For these services, AISZ may collect and process student identification information and, if needed, contact details and medical data disclosed during support sessions or through provided forms. This processing is necessary for enrollment purposes. However, when medical data is involved, AISZ processes it with parental consent.

**Record of Allergies.** During enrollment, parents provide information about students' allergies, which are stored in school systems and backup files to create allergy records. This helps catering services avoid potential allergens and ensures accurate information for medical staff during emergencies. For this purpose, AISZ processes students' personal data with parental consent.

**School Publications and Promotional Materials.** AISZ collects student photos, stories, and experiences for yearbooks, newsletters, and promotional materials, requiring parental consent to publish student information and images. More details on processing images and videos can be found in AISZ's Policy of Use of



Images and Recordings of Students by the School. Additionally, student photos are used to create physical and digital ID cards for identification and safety purposes at the beginning of each school year.

**Sports Competitions.** To enroll students in sports competitions in Croatia and abroad, AISZ shares students' identification, contact, grade, and school information, along with allergy and medical records, with competition organizers. AISZ processes this data with parental consent.

**Learning and Development Tools.** AISZ may provide students with opportunities to assess their learning and apply to colleges using external online tools like NWEA, WJIV, and Bridge U. When students use these tools, they typically create profiles with personal data such as their name, grades, and test results. AISZ processes this data with parental consent.

### **IF YOU ARE ALUMNI (A FORMER STUDENT)**

AISZ collects various categories of personal data from AISZ alumni, including identification information such as name, surname, date, and place of birth, as well as contact information like e-mail address, phone number, and residence. Additionally, AISZ gathers academic records such as diplomas and grade certificates, along with other relevant information such as the period of school attendance and reasons for leaving. Video recordings of alumni obtained through surveillance systems are also part of the data collection process.

While AISZ typically does not collect special categories of personal data on alumni, there are exceptions, such as events organized specifically for AISZ alumni where photos may be processed. In such cases, AISZ ensures that the data subjects are informed appropriately and obtain their respective consent before proceeding with any processing activities.

**The collected data serves several purposes within AISZ.** It is used to **maintain alumni academic records**, ensuring compliance with legal obligations as an educational institution. AISZ also maintains **an alumni database** for communication purposes, organizing alumni events, providing educational information, and fostering potential business relations. This database enables accurate matching of students to their academic data if requested, based on our legitimate interest. Identification and contact details are kept for alumni who opt-in for **newsletters** containing relevant stories, news, and social event information. AISZ also **retains photos and videos** from student enrolment for alumni communication, event promotion, and historical documentation. This processing is done with alumni's or parental consent. As AISZ uses video surveillance and identity verification to protect premises and ensure individuals' safety, alumni's personal data may also be processed in video recordings and entry logs **for security purposes** based on legitimate interest.

### **IF YOU ARE APPLYING FOR A JOB WITH US**

When applying for a job with AISZ, we might collect and process personal data from job applicants for employment purposes. This includes gathering identification and contact information such as name, date and place of birth, e-mail, phone number, and address. Additionally, we collect details about qualifications and work experience, including resumes, education certificates, and work history. We may also collect Police clearance from your home of record and the country that you are currently living in. Applicants may voluntarily provide additional information, such as references. If your interview is conducted on-site, your personal data is processed in our video surveillance system and entry logs as part of our security procedures.

**AISZ collects information from job applicants to choose the best person for the job.** We need to assess your qualifications and experience to identify individuals best suited for available positions. This processing is grounded in our legitimate interests in ensuring a qualified workforce. We also use the collected **data for communication and status updates**, providing applicants with information on their application status, interviews, assessments, and further steps in the recruitment process. This activity is based on the performance of pre-contractual measures at the data subject's request.

If you are selected, AISZ processes your personal data **to facilitate employment arrangements**, including preparing employment contracts and facilitating the onboarding process. This processing is essential for the

performance of a contract. Additionally, we ensure **compliance with legal obligations** by adhering to applicable laws and regulations related to recruitment, employment, and data protection.

With the applicant's consent, AISZ may retain personal data **for potential future employment opportunities** or talent pipelines. If your interview is conducted on-site, your personal data is processed in our video surveillance system and entry logs **as part of our security procedures**. This processing is grounded in our legitimate interests in ensuring the security of premises and property.

## WHEN YOU BECOME OUR EMPLOYEE

We process personal data of our employees. That includes information obtained directly from the employee through onboarding forms, HR portals, meetings, and provided certificates. We also collect data from external sources, such as references from previous employers or information available on platforms like LinkedIn, and data obtained by legitimate actions of AISZ itself or its data processors, such as through employee evaluations, monitoring of IT systems, video surveillance system, and access control measures.

Personal data collected might include **identification information** name, surname, personal identification number, birth details, citizenship, residence, and license plate number; **contact information** including e-mail address, phone number, and emergency contact details; **details regarding qualifications and work experiences** such as education, skills, resume details, and certificates; **employment-related information** including work experience, insurance details, family support, work hours, and performance data; **data necessary for salary calculation and payment** like bank account details, wage components, and payout details; information concerning non-resident employees such as family details, marital status, military service, visa, and passport copy; **other data** voluntarily submitted by the employee; **medical and health data**; and **images and video recordings including** individual and group photos, as well as video recordings obtained through surveillance.

**AISZ processes employee data for various purposes, which include:**

- **Compliance with legal obligations** such as following employment regulations, maintaining records, and calculating salaries.;
- **Human resources management tasks**, including record-keeping, managing working hours, and employee evaluations;
- Ensuring timely and accurate **salary payments and benefits**;
- **Realization of employee rights** related to employment;
- **Business organization and management** for effective workflow and organizational structure;
- **Health, security, and integrity protection** to preserve employee well-being and safety;
- **Emergency preparedness** for immediate response and notification in emergencies;
- **Improvement of the ICT environment** to enhance security and access control to IT systems;
- **Protection of persons and property** against security threats and property damage;
- **Promotional activities** such as publishing content for promotional purposes with employee consent;
- **To contact you or send you newsletters** after your employment ends, but only with your consent.

AISZ processes this data based on legal bases including the performance of the employment contract, compliance with legal obligations, the legitimate interests pursued by AISZ, consent obtained from the employees, and the protection of vital interests of the employees or other individuals.

## WHEN YOU ARE DOING BUSINESS WITH US OR PROVIDING US WITH A SERVICE

AISZ collects and processes various categories of personal data from its suppliers, business partners, or their representatives, including identification information such as name, surname, address, and Personal Identification number (Croatian: OIB) and contact information like e-mail addresses and phone numbers. Additionally, AISZ may gather payment information such as transaction account numbers, bank details, and video recordings obtained through video surveillance.

The processing of personal data by AISZ serves several purposes:

**To conclude and execute contracts with suppliers and business partners.** This includes using personal data for ordering goods, services, or works and for administrative purposes such as communication, invoicing, and payments. AISZ may also utilize personal data for pre-contractual communication and to address inquiries and requests from suppliers and business partners. Such processing is deemed necessary for the performance of contracts with suppliers and business partners and for taking appropriate actions at their request before concluding contracts.

**To ensure regulatory compliance, particularly concerning tax and contribution obligations.** This involves checking suppliers and business partners and their offers and deciding on the acceptance of offers. For this purpose, AISZ may process identification data, payment data, and other relevant information provided during the contractual relationship. This processing is necessary to comply with AISZ's legal obligations.

**For security reasons.** AISZ may process personal data obtained through video surveillance to protect the safety of persons and property on its premises. This includes controlling entry and exit from AISZ premises, reducing the risk of security incidents such as robbery, violence, or theft, and ensuring the safety of all individuals on the school grounds. Such processing is carried out in the legitimate interest of AISZ in safeguarding its premises and the well-being of its community members.

## HOW LONG DO WE KEEP YOUR PERSONAL DATA

AISZ keeps your information only as long as needed. This follows legal requirements and our internal retention policies, which are available upon request. We delete or destroy your information securely when it's no longer needed. If processing is based on consent, data is kept until the consent is withdrawn or for the necessary duration. For example, job applicants who are not employed can request a return of their submitted documentation. Still, with their consent, data may be kept for up to one year for future employment consideration. In some instances, employee and student data may be retained permanently, as per our legal obligations. We maintain the accuracy and updates of your information based on the details provided directly by you, the data subject.

## WHO HAS ACCESS TO YOUR PERSONAL DATA

Access to students' and parents' personal data is granted to appropriate AIS employees, primarily teachers, counselors, and administrative staff, who require access to perform their duties effectively. Counselors and medical staff have access to medical data, while other departments are restricted to specific health information, such as allergies or medical conditions affecting learning.

Similarly, access to personal data of suppliers and business partners, as well as alumni personal information, is limited to AISZ employees who require it for their job tasks. In the recruitment process, HR department employees are granted access to applicants' personal data. Once employed, access to personal data may be extended to other AISZ personnel to perform necessary work tasks, facilitate organizational efficiency and workflow, ensure safety and integrity, and fulfill our legal and contractual obligations.

All employees of AISZ who are authorized to access or otherwise process personal data are required to maintain their confidentiality (as per the employment contract) and act in accordance with privacy notices, policies, procedures, and other general acts and contractual obligations of AISZ.

To the extent in which it is necessary and allowed under regulations, to accomplish purposes for which personal data have been collected and/or processed, AISZ may disclose it to third parties such as:

- Service providers such as school information systems providers, learning software providers, online tools, and server hosting providers.
- Cafeteria owners providing meal services on campus.
- Travel agencies, catering, courier, and transportation providers.

- Photographers and video crews.
- Government and public authorities, court authorities, or private legal entities, when required by law or to protect AISZ's rights and interests.
- Business partners for fulfilling rights and obligations under enrolment, employment, or business contracts.
- Tax, legal, and accounting consultants.

In some cases, personal data may be transferred to countries which are not members of the European Union and European Economic Area which may have different and potentially lower standards of personal data protection than those prescribed in the Republic of Croatia.

In such cases, AISZ shall undertake appropriate protective measures to ensure adequate protection of your personal data. Such measures include the conclusion of the agreements in accordance with forms the European Commission has adopted for such purposes (using so-called standard contractual clauses for transferring personal data abroad).

## **HOW DO WE PROTECT YOUR PERSONAL DATA**

To protect personal data, AISZ undertakes appropriate protective measures which are in accordance with applicable regulations on the protection of privacy and personal data. This also includes requests towards AISZ's service providers to take appropriate measures to protect the confidentiality and safety of processed personal data. In its business, AISZ has implemented technical, physical, and organizational measures to protect personal data from accidental destruction, loss, damage, alteration, unauthorized disclosure or access, and all other forms of illegal and/or excessive processing.

## **WHAT ARE YOUR RIGHTS AS A DATA SUBJECT**

In terms of personal data protection, any individual whose data we process (data subject) possesses the following rights:

- right to access their personal data, i.e. the right to obtain from the controller confirmation as to whether personal data concerning them are being processed,
- right to request access to personal data and information on processing as well as a copy of personal data being processed;
- right to rectification of inaccurate personal data and right to have incomplete personal data completed;
- right to the erasure of personal data, especially if such data are no longer necessary in relation to purposes for which they were collected or otherwise processed, if the personal data have been unlawfully processed, if the personal data must be erased to comply with a legal obligation or if the consent has been withdrawn;
- right to restriction of processing;
- right to object to data processing;
- right to complain to the Croatian Personal Data Protection Agency.

AISZ shall undertake all measures to enable data subjects to exercise the above mentioned rights; however, in some instances, the exercise of these rights can be limited or excluded.

## **HOW TO CONTACT US ON PERSONAL DATA PROTECTION**

For any information, feel free to contact AISZ or AISZ's data protection officer by sending a message to the following e-mail address: [dpo@aisz.hr](mailto:dpo@aisz.hr) or contacting the phone number +385 1 7999 300.





## **AMENDMENTS TO THE NOTICE AND CONSOLIDATED VERSION**

This Notice shall apply as of April 1, 2024, and is subject to occasional amendments. The last version of this Notice, which shall always be relevant for processing personal data in AISZ, is available on AISZ's website.