



## NOTIFICATION – INTRODUCTION OF ISAMS

The Nord Anglia Education group (<http://www.nordangliaeducation.com/>) is committed to protecting the privacy of its students, applicants and their parents/guardians. This notification informs you about the introduction of iSAMS, a cloud-based standardised management information system.

### Who will be the data controller?

For the purpose of the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (the Information Act), the data controller is the British International School Foundation Kindergarten, Primary and Secondary School (The British International School Alapítvány Óvoda, Általános Iskola és Középiskola, 1037 Budapest, Kiscelli köz 17., telephone: +36 1 200 9971 <http://www.nordangliaeducation.com/our-schools/budapest> (the “Budapest School” or “we”) a member of the Nord Anglia Education group.

### What is the purpose and legal basis of data processing?

We handle personal data in order to process a student’s enrolment with the Budapest School and continued education and development, including the review of school performance, setting benchmarks for the school and across the North Anglia Education group, and generally monitor school performance. In this context, unless otherwise indicated to you, processing of Personal Data is voluntary and based on your freely given consent (pursuant to Section 5(1)(a) of the Information Act). We also process personal data, including special categories of data pursuant to Section 6(1)(a) and (5)(a) of the Information Act, as well as under Article 7(b) of the European Data Protection (Directive 95/46/EC) as processing is necessary for the performance of a legal obligation under a contract with you in order to administer student’s education with the Budapest school or in order to take steps at your request prior to entering into a contract with you. Data processing may also be based on Sections 6(1)(b) and 6(5)(b) of the Information Act, as well as under Article 7(f) of the European Data Protection (Directive 95/46/EC) if this is necessary for us to perform obligations for the assertion of our legitimate interests (such as pending litigation) or that of a third person, except where such interests are overridden by the interests of the data subject in the protection of personal data. In such an exceptional case, personal data may be processed without further consent or even after withdrawal of your consent to data processing, but we will provide you the right to object to data processing, unless the applicable data protection legislation provides otherwise.

### What information do we collect?

In the course of our activities, the Budapest School collects Personal Data from our students, from applicants and/or their parents, legal guardians and wards, full-time carers (collectively “Data Subjects”) that is referred to as “student information” as personal data. Student information includes information supplied by Data Subjects and collected in connection with student applications, student records, former students, contacts and communications activities undertaken by us or on our behalf. Student information are kept for purposes that include corresponding with, responding to and taking follow-up actions in respect of students, contacts and communications activities, including the following personal data of Data Subjects:

- Identification data (name, address and telephone number, photographs, languages spoken, date of birth, country of birth, citizenship status; details of siblings at the school (including name, DOB, contact details, age and gender; parent / guardian contact details including name, address, email, telephone and place of work.)
- Electronic identification data (email address);
- Profession (job title and/or position, and work permit);
- Education and training data (professional qualification and education, training and skill data, reports, medical conditions, special education needs, grades and progress, sets, forms, registration groups and after school activities, date of enrolment; student census data including nationality, and birth country; student admission interview notes and pre-enrolment test scores; student transport to and from school



- including school bus, public bus and/ or private car);
- Personal characteristics (gender);
- Tax Identification Number, Social Security Number, and/or number of the ID card.
- Emergency contact information (name, address and telephone number); and
- Image and/or sound recordings.

Special categories of data concern the following student information:

Medical records, ethnicity and religion of Data Subjects.

### What is iSAMS?

Nord Anglia Education group are in the process of implementing a cloud-based standardised Management Information System for all its schools, including the Budapest School. This system, called iSAMS, will allow the Budapest School to better administer its responsibilities to its students, as well as enhancing communication with parents through email/SMS, a new app and a parent portal, thereby giving parents better access to matters such as school timetables, activities and notices. The system will also allow easy retrieval of past students' reports and academic performance should you need a copy for future reference.

### Where is the information stored and who will see the information?

The iSAMS database is administered on behalf of the Budapest School by Nord Anglia Education Limited (Registered in England No. 02116088) 6th Floor, 18 King William Street, London, United Kingdom EC4N 7BP, Telephone : +44 (0)1235 355851; e-mail: enquiries@nordanglia.com) as a data processor. The iSAMS software is licensed through a UK-based company called iSAMS Independent Limited (Eagle House, 28 Billing Road, Northampton, Northants, NN1 5AJ, United Kingdom; company number 05652119) as a data processor. iSAMS Independent Limited will only have access to the personal data in the iSAMS Management Information System as a data processor and only as part of their maintenance and support responsibilities, and will have no other access to or control over such personal data. Further information about iSAMS Independent Limited is available at [www.isams.co.uk/](http://www.isams.co.uk/). The cloud server on which all data forming part of the iSAMS system will be stored is located in London, England. The server will be hosted by Rackspace International GmbH (Balz-Zimmermann-Strasse 7, 8302 Kloten, Switzerland: company number CH-020.4.047.077-1) and by Rackspace Limited (Unit 5 Millington Road, Hayes, Middlesex UB3 4AZ, United Kingdom, Rackspace International GmbH and Rackspace Limited is hereafter jointly referred to as "Rackspace"). Rackspace will only be acting as data processor to the extent their servers host the personal data collected and provide customer support services to the School. Further information on Rackspace is available at <http://www.rackspace.co.uk/legal/subprocessing>; Tel: +44 20 8734 2600; Email: [QTeam-UK@rackspace.com](mailto:QTeam-UK@rackspace.com).

Student information collected from Data Subjects as part of a student's enrolment with the Budapest School will only be shared with other members of the Nord Anglia Education group of companies on an aggregate or anonymised basis to ensure Nord Anglia Education are meeting appropriate performance and compliance standards both within the Budapest School and across the organisation.

Where such personal data is not required to be retained by law, such personal data will be destroyed within 24 months following rejection of the application or otherwise as required or permitted by law.

All practicable and reasonable steps will be taken to ensure that personal data held by us is accurate. We will take all necessary steps to ensure security of the personal data and to avoid unauthorized or accidental access, collection, use, disclosure, copying, modification, disposal, erasure or other use. Access control policies are based on the principles of 'least privilege' and 'segregation of duties.' Segregation is enforced through role based access control policies and technical controls, including physical/logical segregation of workstations.

The terms of the Budapest School's privacy policy can be found at



<http://img.nordangliaeducation.com/resources/europe/filecache/a2e/b0a/10509-privacy-policy.pdf>. For further information about how the Budapest School processes personal data, including student information, please refer to the attached Personal Information Collection Statement.

### **What international data transfer arrangements are in place?**

In case of transfer of your personal data outside of the European Economic Area, where an adequate level of data protection (pursuant to Section 8(2) of the Information Act) is not given in the country of the recipient, we will ensure data security and take all necessary technical and organizational measures and elaborate the rules of procedure necessary to enforce compliance with mandatory rules pertaining to data protection and confidentiality by the data recipient, such as the implementation of standard EU model clauses approved by the European Commission which secure adequate level of protection for personal data pursuant to Section 8(2) of the Information Act. If an adequate level of data protection cannot be guaranteed by other means such as standard EU model clauses, we will obtain your explicit consent to the transfer to of your personal data outside the European Economic Area pursuant to Section 8(1)(a) of the Information Act, unless the law provides otherwise.

### **What are your rights and remedies?**

You have the right to have incomplete, incorrect inappropriate or outdated personal data deleted or updated, marked or blocked. If you believe any of the personal data we hold about you is incomplete, incorrect or outdated, you can inform us and we will make the necessary corrections within the applicable legal timeframes. We will mark personal data if you dispute its correctness or up-to-date status and such claim cannot be verified beyond doubt. You may request that we delete personal data, but we may be required by law to keep such information and not delete it (or to block or mark this information for a certain time, in which case we will comply with the deletion request only after having fulfilled such requirements).

You have the right to know what personal data is held about you. We will respond to such request for access to personal data as soon as possible, but within 30 days at the latest. If permitted by law, we may apply a small charge that will cover the cost of the administration involved in providing such information to you. You are also entitled to object to the processing of your personal data if processing or transfer of personal data is necessary solely for the performance of a contractual obligation, necessary for the enforcement of the legitimate interest of ours, a data recipient or any other third person (except if the data processing is compulsory); as well as if permitted by law. Such objection will be investigated by us within 15 days of filing the objection. If you do not agree with our decision as regards any objection, you are entitled to initiate court proceedings within 30 days after receipt of the decision refusing such objection.

If you consider that your rights as have been infringed, you may contact the National Data Protection and Freedom of Information Agency (1024 Budapest, Szilágyi Erzsébet fasor 22/C.; Telephone: +36-1-391-1400, Telefax: +36-1-391-1410, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or may file court proceedings against the Budapest School in which you also may request compensation of damages sustained as a result of the unlawful processing of personal data or as a result of an infringement of the security requirements of data protection. You are hereby notified that court action may be filed before the court having jurisdiction over the data subject's place of domicile or habitual residence within Hungary.

For information regarding data protection inquiries and requests by applicants, students and their parents/guardians, please contact the Principal of the British International School Budapest (1037 Budapest, Kiscelli Köz 17, Hungary; Tel: (1) 200 9971) and who may be reached at [office@bisb.hu](mailto:office@bisb.hu).