

# **PRIVACY STATEMENT**

The **Privacy Statement** for **Dasman Bilingual School** in Kuwait, reflects common practices in Cognita schools across the Middle East.

#### 1. Introduction

- Dasman Bilingual School ("DBS" or "we") is committed to protecting the privacy of students, families, staff, contractors, and visitors.
- This Privacy Policy outlines how DBS collects, uses, and manages personal data.
- "Personal Data" includes any identifiable information collected through services like the website, admissions, and school activities.
- The policy may be updated periodically to reflect changes in law, technology, or practice.
- By using DBS platforms or submitting personal data, individuals consent to the policy and data processing described.

### 2. Scope

2.1 This Privacy Policy applies to all individuals whose Personal Data is collected by DBS, including current and prospective students, parents or guardians, staff, contractors, and visitors.

### 3. Your Personal Data

### 3.1 What We Collect and Why

3.1.1 The Personal Data we collect may include:

- Names, contact details, Civil ID/passport numbers, and residency information
- Health and medical details, including allergies, medications, and vaccination records
- Educational history, academic performance, behavioral records
- Photographs, video recordings, and potentially biometric data
- Attendance records, disciplinary records, and parental communications
- Information about guardianship and legal status
- 3.1.2 Reasons for collection include but are not limited to:
  - Managing admissions and enrolment
  - Providing educational and pastoral care services
  - Monitoring student progress
  - Ensuring the safety, security, and wellbeing of the school community
  - Communicating with parents and guardians
  - Managing financial accounts and payments
  - Organizing school trips, extracurricular events, and communications

3.1.3 Special category data (e.g., health, religion, ethnicity, biometric or criminal record information) may be processed under applicable Kuwaiti law or with explicit consent, particularly for safeguarding or employment obligations.

#### 3.2 Use of Personal Data

- **3.2.1**: Personal data is accessed only by DBS staff or approved third parties with a legitimate need and confidentiality obligations.
- **3.2.2**: Data may be shared with legal bodies, education regulators, or medical professionals when required by law or in emergencies.
- **3.2.3**: Images/videos of students or parents may be used for internal or marketing purposes with consent. Opt-out requests can be made through the Marketing Office.
- **3.2.4** We may also request your consent for:
  - Emailing you news and promotional content
  - Sharing information with guardians or caregivers

• Conducting financial assessments for scholarships or bursaries

## 3.3 Legal Basis for Processing

We process Personal Data based on:

- Contractual obligations (education provision)
- Legal requirements (safeguarding, regulatory compliance)
- Legitimate interests (community engagement, educational improvement)
- Consent (for optional or promotional uses)

## 4. Data Sharing and Access

4.1 Access to Personal Data is limited to staff with a defined need, under access protocols. Special records (e.g., medical or safeguarding) are restricted to authorized personnel.

4.2 Some data may be shared externally with:

- Educational service providers and exam boards
- IT systems and online learning platforms
- Legal, insurance, or compliance professionals
- Health and pastoral care providers

4.3 Where data is transferred outside Kuwait, we ensure it is protected by appropriate legal safeguards.

### 5. System Information and IP Addresses

5.1 Our IT systems may collect usage data such as IP addresses, browser type, and access times to improve user experience and system security.

5.2 We may share this information for legitimate reasons, such as technical support or legal compliance.

### 6. Cookies

6.1 We use cookies to enhance your experience on our website and collect usage analytics.

6.2 You may disable cookies in your browser settings, though this may impact site functionality.

### 7. Security

7.1 DBS implements administrative, technical, and physical measures to protect Personal Data in compliance with Kuwaiti Data Protection regulations.

7.2 Despite these safeguards, no system can be guaranteed 100% secure.

7.3 In the event of a data breach, we will notify affected individuals in accordance with applicable law.

### 8. Your Rights

8.1 Subject to Kuwaiti data protection laws, you may request access to, correction of, or deletion of your Personal Data by contacting us at: <u>info@dasmanschool.com.kw</u>

### 9. Data Retention

9.1 Personal Data is retained only as long as necessary for educational, legal, and archival purposes.

- Student records: typically retained for 5 years post-graduation
- Staff records: typically retained for 5 years post resignation/termination
- Safeguarding and SEN records: retained longer per regulatory requirements
- Archived records may be retained for historical or statistical purposes

### 10. Contact

For questions or concerns regarding your data, contact:

Dasman Bilingual School, Kuwait Email: <u>info@dasmanschool.com.kw</u>

# **DOCUMENT CONTROL**

COMPLIANCE	
Compliant with	Kuwait Laws

AUDIENCE	
Internal	All staff in Dasman Bilingual School

VERSION CONTROL	
Author	SLT, Ms. Afnan & Fay Khan
Implementation	Annually-August to June
Review date	1 <sup>st</sup> June Annually