CAPITAL SCHOOL BAHRAIN

Privacy Policy

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1. Capital School Bahrain Data Privacy Notice

- Capital School Bahrain Bahrain (hereafter referred to as "we" or “our” or "us" or “Capital School Bahrain” or “organisation”) respects your right to data privacy. In this Notice “You” or “Your” refers to the data subject (pupils/pupil, guardians and parents, prospective pupils and applicants to our admissions process, employees, website visitors, visitors to our campuses or contingent workers) whose personal data is processed by Capital School Bahrain.

- This privacy notice explains who we are, how we collect, share and use personal data about you, and how you can exercise your data privacy rights. The details on what personal data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

2. Definitions

2.Data Subject

The person or individual subject of data.

2.2 Personal Data

Data or Personal Data is any information in any form concerning an identified individual (applies to customers, employees, vendors, sub-contractors or any stakeholders with which the organisation has a relationship), be identified by reference, in particular, to his or her personal identification number, name, addresses, contact numbers, licence numbers, records, personal property, bank account and credit card numbers, fixed or moving pictures of the individual, online identifier, or by reference to one or more factors specific to his or her physical, physiological, intellectual, cultural, economic, or social identity.

In determining whether an individual is identifiable, all the means that the organisation uses or may have access to, should be taken into consideration.

2.3 Processing

Processing means any operation or set of operations performed upon personal data by the organisation or its representatives, whether by automatic means, including collecting, recording, organising, classifying, storing, adapting, altering, retrieving, using, disclosing by transmission, dissemination, transference or otherwise making available for others, or combining, blocking, erasing, or destructing such data.

2.4 Special Category / Sensitive Personal data

Personal data that may reveal directly or indirectly - an individual’s race, ethnic origin, political or philosophical opinions, religious beliefs, affiliation to union, personal criminal record and security data, biometric data, genetic data, credit data, location data, and data that indicates that both parents of an individual or one of them is unknown or any information in relation to his health or sexual condition.

2.5 Contingent workers

Contingent workers mean non-permanent workers including agents, consultants, independent contractors, sub-contractors, temporary workers, professional advisors, interns and those affiliated with third parties.

2.6 Data Controller

Capital School Bahrain Bahrain or its employees representing the organisation who determines the purposes and means of processing personal data which the organisation processes.

2.7 Joint controller

Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.

2.8 Group company **(Group)**

Includes a holding company, subsidiary, associate entities (including a joint venture company) and a subsidiary of a holding entity to which the entity is also a subsidiary.
If you have any questions or concerns about our Processing of your Personal Data, then please contact us at admissions@capitalschoolbahrain.com

3. When do we collect your Personal Data?

3.1 Direct interactions

You may give us your identity, contact, resume by filling in forms or by corresponding with us by phone, and email, or otherwise. This includes sharing of Personal Data for the following purpose:

- Records of your interactions with us such as emails and other correspondence and your instructions to us;
- Providing your feedback;
- By filling in forms, for example our admissions application forms and Google Forms;
- By sharing your Personal Data such as resume for recruitment purposes;
- Apps and other software used by the School;
- By interacting with us on social media platforms such as Facebook, Instagram and LinkedIn etc.;
- By visiting our campuses or events, for example in the form of CCTV footage from cameras which are present on both our campuses.

3.2 Automated technologies or interactions

- **Log Files.** Log information is data about your use of the service, such as IP (Internet Protocol) address, browser type, referring/exit pages, operating system, date/time stamps, and related data, which is stored in log files.

- **Cookies.** A cookie is a small data file transferred to your computer (or other device) when it is used to access our service. Cookies may be used for many purposes, including to enable certain features of our service and remember your preferences, your equipment, browsing actions and patterns, to

better understand how you interact with our service, to provide you advertising on and off the service, and to monitor usage by visitors and online traffic routing. You may be able to instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the online services you visit. If you do not accept cookies, however, you may not be able to use all portions of our service or all functionality of our service.

3.3 Third parties or publicly available sources

We may receive aggregated Personal Data about you from various third parties as mentioned below:
Technical Data from the following parties:

- Analytics providers such as Google, Facebook;
- Social media platforms such as Facebook, Twitter, Instagram or LinkedIn

4. What Personal Data do we collect?

We may collect, store, and use the following categories of Personal Data about you:

4.1 Identity Data

- Full name
- Family details, relationships/next of kin;
- Nationality;
- Images and audio and video recordings;
- Marital status
- Resume
- ID documentation

4.2 Contact Data

- Email address
- Telephone numbers/ contact number
- Home address

4.3 Technical Data

- Internet protocol (IP) address;
- We also track how often you visit and use our website. We do this via email and website cookies and similar tracking technology built into our website.

4.4 Profile Data

- Your interests, preferences, feedback and survey responses;
- Profile image;
- Pupil and staff behavioural/disciplinary records;
- Admission forms, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;

- Courses, meetings or events attended;
- About (mentioned in resume);
- Recruiting information including references;
- Education and employment data, including qualifications;
- Bank details and other financial information;

4.5 Usage Data

- Information about how you use our website, products and services;
- Information on what you view, click on, access by way of our emails and text messages, website and mobile.

4.6 Marketing and Communications Data

We do not collect any Personal Data for marketing purposes. However:

- We may ask you to leave a review or take a survey to allow us to provide you with a better service;
- We may also collect your Personal Data to respond to your queries and comments, social media posts and questions/ queries.

4.7 Aggregated Data (sometimes referred to a pseudonymised data)

We also collect, use and share aggregated data (sometimes referred to as pseudonymised data) such as statistical or demographic data for any purpose. Aggregated data may be derived from your Personal Data but is not considered Personal Data in the applicable law(s) as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this data privacy notice.

4.8 Sensitive Personal Data or Special Category of Personal Data

Our intention is not to collect or process any Special Category of Personal Data about you, unless required by applicable laws. However, in certain circumstances, we may need to collect, or request your Special Category of Personal Data for the following purposes:

- to assess the support needs of applicant/prospective and existing pupils, for example, we may collect health information and information regarding your child's first (and, if relevant, second and third) language(s), which may reveal ethnicity;
- to deliver the national curriculum requirements, for example, delivering the curriculum classes which are compulsory for Muslim pupils and pupils of Arab ethnicity;
- to safeguard pupils' welfare, for example to provide appropriate health and medical protection, treatment and services within school, and out with the school such as while on school trips, and security;
- to safeguard pupils' welfare and provide pastoral care, for example, through safeguarding records and collecting information in relation to our existing staff which may reveal criminal records (when carrying out DBS checks, and collection of Good Conduct Certificates);

- for pupil body diversity monitoring;
- to assign pupils to classes to ensure diversity within each of our form classes;
- in the case of a trip, event or activity where we are providing food or food may be provided, we may collect information about dietary requirements/preferences (which may reveal ethnicity, political or philosophical opinions or religious beliefs) and food allergies of the attendee(s);
- employment related purposes via resume shared, for example, data regarding your hobbies and preferences, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations;
- for the purposes of media management (to process and store pupil images on our secure cloud-based photo management platform (see section below on biometric data for additional details).

We do not collect, store and use information about your sexual orientation.

5. How and why do we use your Personal Data?

We are currently in the process of moving towards becoming fully compliant with the Personal Data Protection Law (PDPL) of Bahrain and, as part of this process, we are reviewing our data processing activities. Our aim is to only use your Personal Data when the law allows us to and use your Personal Data in the following circumstances:

- The Processing is necessary for reasons of substantial public interest, or for official purposes or requested for or by the police or governmental authorities on a lawful basis;
- It is necessary for the establishment, exercise or defence of legal claims, for the purposes of carrying out the obligations and exercising our or your rights in the field of employment, social security and social protection law; or
- Based on your explicit consent;
- Where we need to perform the contract, we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where Processing is necessary to protect the vital interests of the Data Subject or of another natural person.

6. Legitimate Interest

- Means the interest we have in conducting and managing our organisation to enable us to provide the best service and the best and most secure experience;
- We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests;
- We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by laws).
- We may also use your Personal Data in the following situations, which are likely to be rare:
- Where we need to protect your interests (or someone else's interests);
- Where it is needed in the public interest or for official purposes.

7. Purpose/ activity, type of data and lawful basis for Processing

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, as well as the legal basis on which we intend to rely. We have also identified what our legitimate

interests are, where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

However, our aim is to normally collect Personal Data from you only where we have your consent to do so, where we need the Personal Data to perform a contract with you, or where the Processing is in the legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In certain cases, we may also have legal obligations to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another Data Subject.

Some of the above grounds for Processing will overlap and there may be several grounds which justify our use of your Personal Data.

Purpose/Activity	Type of data	Lawful basis for Processing including basis of legitimate interest
To provide education services, physical training or spiritual development, career services, extra-curricular activities and monitoring pupils' progress and educational needs which will include: a) To ascertain curriculum requirements and suitable curriculum b) To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School; b) To safeguard pupils' welfare, health and provide pastoral care; c) To provide school transport services, catering, specialised support, etc; d) To enable relevant authorities to monitor the School's	a) Identity b) Contact c) Profile d) Aggregated Data	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests d) Your consent

performance and to intervene or assist with incidents as appropriate; e) To give and receive information and references about past, current and prospective pupils, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils.		
For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents) For the purposes of the School yearbook, class / hallway wall displays, parent web platforms, staff / pupil presentations, School social media posts, press / public relations, marketing (School's website, and print media - School prospectus, brochures, flyers, announcements, press releases, etc).	a) Identity b) Contact c) Profile d) Image	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests d) Your consent
To manage and maintain our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey c) Responding to your queries and comments, social media posts and questions. d) communicating and interacting with Alumnae and the School community, including	a) Identity b) Contact c) Profile	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services) d) Your consent

marketing or fundraising activity e) For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests f) For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or analysis) g) To make use of photographic images of pupils in the School's publications on the School's website and (where appropriate) on the School's social media channels;		
a) To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Identity b) Contact c) Technical	a) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b) Necessary to comply with a legal obligation
a) To make suggestions and recommendations to you about goods or services that may be of interest to you	a) Identity b) Contact c) Technical d) Usage e) Profile f) Aggregated Data	a) Necessary for our legitimate interests (to develop our services)
a) To power our security measures and services in order to protect you, our pupils and our	a) Identity b) Technical c) Usage	a) Necessary for our legitimate interest so we can safely provide our services.

organisation		

If we ask you to provide any other Personal Data not described above, our aim is that the Personal Data we will ask you to provide, and the reasons why we ask you to provide the Personal Data, will be made clear to you at the point we collect your Personal Data.

However, we may also use your Personal Data for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable laws.

8. Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

If you wish to get an explanation as to how the Processing for the new purpose is compatible with the original purpose, please contact us using the contact details provided.

9. Who do we share your Personal Data with?

On occasion we may have to share your Personal Data with the parties set out below for the purposes set out.

9.1 Internal Third Parties

Entities, subsidiaries and businesses within our Group. For example, we'll share information from our website at https://www.capitalschoolbahrain.com/ with the internal third parties, having similar arrangements between our other organisations. This is because we hope to have a relationship with you across all our businesses, if not now, then sometime in the future and we want to be able to provide you with the same value for money and high-quality experience for the services provided to you by us. It's also the only way we can provide you with the best benefits.

9.2 External Third Parties

- Third party data processors.
- Regulators and other authorities: acting as processors or Joint Controllers based in Bahrain who require reporting of Processing activities in certain circumstances.
- With social media companies.
- Any new business partners: we may have over time, for example, in the event of a joint venture, reorganisation, merger or sale that affects us.
- The Police, local authorities, the courts and any other government authority: if they ask us to do so (but only if our doing so is lawful).
- Other people who make a 'data subject access request': where we are required to do so by law.
- We may also share the information we collect where we are legally obliged to do so, e.g. to comply with a court order.
- Any social media posts or comments you send to us: (on the Capital School Bahrain Facebook page,

for instance) will be shared under the terms of the relevant social media platform on which they're written and could be made public. Other people, not us, control these platforms. We're not responsible for this kind of sharing. Before you make any remarks or observations about anything, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you'll understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you're unhappy about it. It's worth remembering too that any blog, review or other posts or comments you make about us, our products and services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large. You should take extra care to ensure that any comments you make on these services, and on social media in general are fit to be read by the public, and are not offensive, insulting or defamatory. Ultimately, you are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

- Third parties: to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy notice. We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

9.3 International Transfers

We may share your Personal Data. Some of our external third parties are based outside the country and so their Processing of your Personal Data will involve a transfer of data outside the country.
Please contact us if you want further information on how we transfer your Personal Data out of the Kingdom. Information regarding the third countries and international organisations to whom Personal Data may be shared can be made available by contacting the school admissions team at admissions@capitalschoolbahrain.com

10. How do we protect your Personal Data?

We use appropriate technical and organisational measures to protect the Personal Data that we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of Processing your Personal Data.

A lot of the information we receive reaches us electronically, originating from your devices, and is then transmitted by your relevant telecoms network provider. Where it's within our control, we put measures in place to ensure this 'in flight' data is as secure as it possibly can be.

Sensitive data like passwords are protected for data in transit by data encryption. In addition to encryption, we have implemented robust network security controls to help protect data in transit. Network security solutions like firewalls and / or network access control to secure the networks used to transmit data against malware attacks or intrusions.
We use secure means to communicate with you where appropriate, such as 'https' and other security and encryption protocols.

11. How long will we keep your Personal Data?

We are currently in the process of moving towards becoming fully compliant with the Personal Data Protection Law (PDPL) and, as part of this process, we are reviewing our data retention processes and the data which we currently hold. Our aim, to make sure we meet our legal data protection and privacy obligations, is to ensure that we only hold on to your information for as long as we actually need it for the purposes we acquired it for in the first place. After that we will either delete it, mask it or anonymize it so that it cannot be linked back to you.

We will retain Personal Data we process where we have legitimate interest, performance of the contract, vital interest of Data Subject or of another natural person, performance of a task carried out in the public interest or in the exercise of official authority vested or for the purposes of satisfying any legal, accounting, or other regulatory reporting requirements or with your consent.

12. What are your Data Protection Rights?

13.1 Your duty to inform us of changes

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes by keeping your details up to date on our website and by sharing your updated details with our school admissions team at admissions@capitalschoolbahrain.com

13.2 Your rights in connection with Personal Data

Under certain circumstances, by law you have the right to:

- Request access: To your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully Processing it.
- Request rectification: Of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. We may need to verify the accuracy of any new data you provide to us.
- Request erasure: Of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to Processing, where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to Processing: Of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to Processing on this ground. You also have the right to object where we are Processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which means we can continue to process your Personal Data.
- Request the restriction of Processing: Of your Personal Data. This enables you to ask us to suspend the Processing of your Personal Data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request for portability: Of your Personal Data to another party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to withdraw consent at any time: Where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any Processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Right to lodge a complaint with the Authority: In case you consider that the Processing of your Personal Data infringes any of your rights or provisions related to the laws and regulations in scope.

13. Fees for excessive or unreasonable requests

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

14. Time limit to respond

We try to respond to all legitimate requests within 10 working days. Occasionally, it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

15. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

If you wish to exercise any of the rights set out above, please contact us at admissions@capitalschoolbahrain.com

16. Indemnity and Limitation of Liability

You agree to defend, indemnify and hold harmless Capital School Bahrain, its officers, directors and

employees from and against any and all claims, liabilities, damages, losses or expenses, including settlement amounts and reasonable legal fees and costs, arising out of or in any way connected with your access to or use of this site.

Although the organisation shall make every attempt to keep the website free from viruses, it cannot guarantee that it is virus/ malware free. For your own protection, you should take necessary steps to implement appropriate security measures and utilise a virus scanner before downloading any information from the website.

Capital School Bahrain, its officers, directors and employees, shall not be liable in any manner whatsoever for any direct, indirect, incidental, consequential, or punitive damage resulting from the use of, access of, or inability to use the information available on the website or the services provided by the organisation. Capital School Bahrain, its officers, directors and employees shall not be liable in any way for possible errors or omissions in the contents on the website.

17. Intellectual Property Rights

All information on this website is protected by copyright and other intellectual property rights. No images, text or other content from this website may be distributed or reproduced without the prior written approval from the organisation.

18. Changes to this data privacy notice

We may update this data privacy notice from time to time in response to emerging legal, technical, contractual, regulatory or business developments. When we update our data privacy notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

We will obtain your consent to any material privacy notice changes if and where this is required by applicable laws.
You can see when this privacy notice was last updated by checking the “last updated” date displayed at the top of this privacy notice.

If you have any questions regarding this privacy notice, kindly contact:
secretray@capitalschoolbahrain.com