



British School
of Bucharest

Personal Data Processing

In accordance with the provisions of Order no. 52 of 18th April 2002 on the Approval of the minimum security requirements in the processing of personal data corroborated with the provisions of Law no. 677 of November 21st 2001 for the protection of individuals regarding the processing of personal data and the free movement of such data, Crawford House foundation (CHF), registered with the 1st District Court of Bucharest in the Special Registry under no. 3/25.01.2016, with registered office in 4E Zăgazului, Entrance B, ground floor, Ap. B4, Room 3, Sector 1, Bucharest, Fiscal Number 24879960, hereinafter named operator or CHF, processes personal data to legitimate aims, while observing the legal provisions and the principles mentioned hereinafter.

The processing of personal data is performed based on mixed instruments (both manual and automatic), in such conditions so as to ensure the security, confidentiality and respect for the rights of the persons concerned.

DEFINITIONS

PERSONAL DATA - Any information regarding an identified or identifiable natural person; an identifiable person is that person who can be identified, directly or indirectly, particularly by reference to an identification number or to one or more specific factors of his natural, physiological, psychological, economic, cultural or social identity

CONSENT - The concerned person's unaltered agreement to process his/her personal data, which has to be express and unequivocal.

PROCESSING OF PERSONAL DATA - Any operation or set of operations which is performed on personal data, either by automatic or non-automatic instruments, such as the collection, recording, storage, adaptation or modification, extracting, consulting, using, disclosure to third-parties by transmission, dissemination or in any other way, together with the combination, blocking, deletion or destruction.

OPERATOR - Any private or public natural or legal person, including the public authorities, institutions and territorial structures thereof, which establish the purpose and instruments of personal data processing.

CONCERNED PERSON - natural person, whose personal data are processed.

USER - person who acts under the authority of the operator, of the authorized person, or of the representative, having a recognized right to access the database containing personal data.

PERSONAL DATA PROCESSING PRINCIPLES:

- **NOTIFICATION** - by the Notification registered with the National Authority for the Supervision of Personal Data Processing under no. 22813, CHF, as a personal data operator, has notified the processing of personal data of the persons who register for the educational courses organized by CHF through The British School of Bucharest, for the purpose of education and culture.
- **LEGALITY** - The personal data is processed by observing the legislation applicable on Romanian territory.
- **DETERMINED PURPOSE** - Any personal data processing is performed to determined, explicit and legitimate, adequate, pertinent and not excessive purposes, in relation to the purposes for which they are collected and subsequently processed.
- **CONFIDENTIALITY OVER THE PROCESSED DATA** - CHF guarantees the confidentiality over the personal data it processes
- **DATA ACCURACY** - CHF will take the necessary measures so that the inaccurate or incomplete data, as to the purpose for which it is collected, is either corrected or deleted.
- **STORAGE** - The personal data shall not be stored for a longer period than it is necessary for accomplishing the objectives for which they were collected.



Independent
Schools Inspectorate
British Schools Overseas Inspection
14 - 17.05.2015
isi.net/schools/7480/

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- **INFORMATION** - Before the processing of personal data, CHF shall inform the concerned persons that their personal data will be processed.
- **THE CONCERNED PERSONS' PROTECTION** - The concerned persons have the right to the personal data which are processed by CHF, the right to intervene on these data by correcting, updating, blocking or deleting the inaccurate or incomplete data, the right of opposition, the right not to be subject to any individual decisions, as well as the right to address the National Authority for the Supervision of Personal Data Processing or a court of law, in order to defend any rights guaranteed by the law, on which it was infringed.
- **SECURITY OF PERSONAL DATA PROCESSING** - CHF shall take any technical and organisational measures for the security of personal data in order to protect these data against the accidental or illegal destruction, loss, modification, disclosure or unauthorized access.
- Furthermore, the persons who are processing personal data on behalf of the operator CHF, have a confidentiality clause included in their labour contract or in their job description and process the data according to the internal procedure regarding data processing.

THE CONSENT OF THE CONCERNED PERSON FOR THE PROCESSING OF DATA

Based on the provisions of Law no. 677/2001, on the protection of the individuals regarding the processing of personal data and the free movement of these data, CHF shall process the personal data exclusively for the purposes mentioned below, ensuring a protection and security level adequate for the processing of personal data.

Any personal data processing which doesn't fall in the category of those detailed previously, shall be performed only if the concerned person expressed her/his consent for the processing in an explicit and unequivocal manner.

The consent of the concerned person is not required in the following cases:

- when the processing is necessary in order to execute an agreement or a promissory agreement, at which the concerned person is one of the parties or in order to take measures, on her/his request, before concluding an agreement or a promissory agreement;
- when the processing is necessary in order to protect the life, physical integrity or health of the person concerned or of any other endangered person;
- when the processing is necessary in order to fulfil a legal obligation of the operator;
- when the processing is necessary in order to bring to fulfilment some measures of public interest or which concern the exercising of the public authority prerogatives vested in the operator or third party to which the data are disclosed;
- when the processing is necessary in order to achieve a legitimate interest of the operator or the third party to which the data are disclosed, provided that this interest doesn't damage the interest or fundamental rights and liberties of the person concerned;
- when the processing regards data obtained from documents accessible to the public, according to the law;
- when the processing is made exclusively for statistical, historical or scientific research purposes and the data remains anonymous during the entire duration of the processing.

The personal data which is electronically recorded directly by the person concerned, based on an online form, existing on the website www.britishschool.ro, shall be used only for the purpose declared in this policy.

The personal data (identification data, address, personal identification number, parents' names, telephone number, e-mail address, data regarding the education level or any other such data), collected from the person concerned, shall be processed and used by CHF, only if the person concerned expressly consented to such a processing (art. 7 par. 2 of Law no. 677/2001).





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DATA PROCESSING PURPOSE

CHF processes personal data of pupils, their legal representatives and teachers, all the participants in the teaching activity of British School of Bucharest, the school managed by the CHF data operator, data which are collected by means of schooling contracts, on-line registration forms and labour contracts.

The personal data (identification data, address, personal identification number, parents' names, telephone number, e-mail address, data regarding the education level or any other such data), collected from the person concerned, can be processed and used by CHF for the purpose of setting up a database with the pupils and teachers who participate in the teaching activity performed by CHF, according to the provisions of Law no. 677/2001 on the protection of the individuals regarding the processing of personal data and the free movement of this data.

CHF also collects a series of information without mandatory character (such as: the email address) in order to improve the communication with the participants at the courses, so as to announce any modifications which could arise in the programs, by means of the electronic mail communication.

PERSONAL DATA USERS

The persons named by CHF as having responsibilities in the processing of personal data have the quality of users, while their activity is performed based on internal procedures established according to the law, regarding the confidentiality, access limitation and the security of the processed data. CHF informs the personnel regarding the provisions of Law no. 677/2001 on the protection of the individuals regarding the processing of personal data and the free movement of this data, the minimum security requirements in the processing of personal data, as well as the risks involved by the processing of personal data, according to each person's responsibilities.

SECURITY OF PERSONAL DATA

CHF meets the minimum security requirements regarding the processing of personal data and, to this purpose, CHF establishes, besides the implementation of the technical measures for keeping the confidentiality and integrity of personal data, also internal procedures related to the confidentiality and security of the data processed, the type of access to the personal data, as well as to procedures for the destruction of the data after the processing was finalized.

THE RIGHTS OF THE CONCERNED PERSON, according to the provisions of Law no. 677/2001

The right to information to be obtained from CHF, upon request and free of charge, limited to one request per year, the confirmation of the fact that his/her personal data are or aren't processed by CHF.

The right of access to the personal data - the right to obtain from CHF, upon request and free of charge, the correction, updating, blocking or deletion of personal data processed by CHF, especially of the incomplete or inaccurate data, based on supporting documents.

The right to intervene on the personal data - the right to obtain from CHF, upon request and free of charge, the transformation in anonymous data of the data which is not processed in accordance with Law no. 677/2001.

The right of opposition - the right to oppose in any moment, for duly justified and legitimate reasons, that her/his personal data form the object of a processing, unless there are contrary legal provisions.



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The right not to be subject to an individual decision – any person has the right to request and obtain:

- the revocation or annulment of any decision which is effective in his/her respect, adopted exclusively based on a processing of personal data, performed by automatic instruments, aimed to evaluate some aspects of her/his personality, such as the professional competence, credibility, his/her behaviour or any other such aspects.
- the re-evaluation of any other decision made in his/her respect, which significantly affects her/him, if the decision was adopted exclusively based on a data processing which meets the conditions provided for.

The right to seek legal remedy for the defence of any rights guaranteed by Law no. 677/2001, on which it was infringed.

THE TRANSFER OF PERSONAL DATA TO OTHER STATES:

The concerned persons' personal data processed by CHF, can be transferred in other states, in certain cases, but only with the prior explicit consent of the person concerned.

In order to submit a claim regarding the non-observance of the rights guaranteed by Law no. 677/2001, the concerned persons can turn to CHF, by the Secretariat, at the address 42 Iancu Nicolae, Voluntari, Ilfov; if the request is not solved, they can turn to the National Authority for the Supervision of Personal Data Processing or/and the courts of law.

Contact data of the National Authority for the Supervision of Personal Data Processing: Address: 28-30 Gheorghe Magheru Avenue, District 1, 010336, Bucharest, Romania, Tel: +40.318.059.211; +40.318.059.212; Fax: +40.318.059.602

Reviewed by Andrei Voicu

Security Manager

November 2017

To be reviewed November 2018



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