

Policy Name	Privacy Policy for Parents & Students
Policy Number	G4
Link to Group Policy Area	
Effective Date	01 May 2024
Title of Staff Responsible	Chief Operating Officer
Review Frequency	1 year
Review Date	01 April 2025

Charterhouse Lagos ("Charterhouse", "We, "Our") is highly committed to protecting and respecting the privacy of parents and their wards. In view of this, we have provided you with this Privacy Policy ("Policy") which explains why we will collect your personal information, what we will do with it and for how long we will keep it.

If any information in this Policy is unclear, please contact the school, or the School's Data Protection Officer.

## Applicability of Our Privacy Policy

This Policy applies to your interaction with us on our website at www.charterhouselagos.com; or our staff, service providers and agents for the purpose of providing our services to you. We advise that you read this Policy before you provide us with your personal information. We also advise you to constantly review it in light of any changes we may make. We will, however, notify you once we make changes to this Policy.

## What Personal Information Do We Collect and Process?

Personal Information is any information that personally identifies an individual, or information from which an individual could be identified. We may collect the following personal information from you or your ward:

- name and contact information (telephone number, work and residential address and email address).
- gender.
- date of birth.
- photographs and CCTV images.
- biometric information.
- information on ethnicity, religion, language, nationality, country of birth.
- students' assessment information.

- relevant medical information.
- students' educational needs.
- financial information; etc

Generally, the School will collect personal data directly from you. This may be by requiring you or your ward to fill forms or through direct communication.

#### What Non-Personal Information Do We Collect?

We may collect information that cannot be used to identify you or your ward, such information include:

- students' attendance information;
- information from your use of our website (e.g. your browser name, the type of
  device used to access our site, the time and date of access and other technical
  information about your means of connection to our site. We track this information
  using our cookies. Please read our Cookie Policy.

#### How Do We Use Your Personal Information?

We will use the personal information we collect for the purpose of providing Our services to you and ensuring the well-being of your wards. Specifically, this may include:

- to select, onboard and enrol students;
- to provide our education services. This includes academic training, musical education, physical training, spiritual development, career advisory and extracurricular activities and monitoring the students;
- to monitor and report the progress of students;
- to enable students to take part in national or other assessments, and to publish
  the results of public examinations or other achievements of students of the
  School;
- to provide medical care to students;
- for maintaining relationships with alumni of the School;
- to inform you about events and other things happening in the School;
- to assess the quality of Our services;
- to monitor (as appropriate) use of the School's Information Technology (IT) and communications systems in accordance with the School's IT: acceptable use policy;
- for advertisement of the School's Services. (We may use of photographic images of students in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children;
- for legal and regulatory purposes; and
- to ensure the security of the students

Overall, we will ensure that Our legal basis for processing Personal information falls within at least one of the following categories:

- You have granted us your consent to process personal information;
- processing your personal information is necessary for:
  - ✓ the performance of a contract which You are a party to;
  - ✓ compliance with our legal obligation;
  - ✓ protecting your vital interest or that of another person; and
  - ✓ a task carried out by us in the interest of the public.

#### How Do We Protect Your Information?

We adopt appropriate data collection, storage and processing practices and security measures to prevent unauthorized access, alteration, disclosure or destruction of personal information shared with us.

Although we will endeavour to properly protect your information, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed while being transmitted or while stored on our systems. By using our services, you acknowledge that you understand and agree to assume these risks. In the unlikely event that we believe that the security of your information in our possession or control may have been compromised, we shall notify you immediately, except otherwise unnecessary.

In the event of any compromise to your Personal Information, we shall immediately take steps to avert the effect of any breach which may have occurred.

## Will the School Share Your Information with Anyone?

We may retain the services of other service providers, suppliers, and partners to manage or support the operation of the school. We may, therefore, share your personal information with these third parties solely for the purpose of providing our services to you.

We will not sell, trade, or rent your personal identification information to others. We may, however, share generic aggregated demographic information not linked to any personal information regarding you with advertisers and marketers.

We may disclose personal information if required to do so by law or in the good faith belief that such action is necessary to: (a) conform with the requirements of the law or comply with legal process served on us; or (b) act in urgent circumstances to protect you or your ward's personal safety, or the safety of the members of the public. To the extent practicable and legally permitted, we will attempt to advise you prior to any such disclosure, so that you may seek a protective order or other relief limiting such disclosure.

## **Third-Party Websites**

Where You find advertisements or other content on our website, please note that We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our website. We will notify you once you are leaving our website to enable you to decide whether to proceed or not. We advise you to read the privacy statements of all third-party websites before submitting any personal information.

#### What Information Will We Retain?

We will retain your information for as long as your child remains a student of the School. Upon graduation from the school, we will restrict the information we retain to the minimum required for regulatory purposes and for communicating with your child as an alumni of the school.

## How do we Store Your Information?

Although we maintain appropriate administrative, technical and physical safeguards over your information, your information may be transferred to and stored outside Nigeria. It may be processed by staff operating outside Nigeria or transferred to third parties outside Nigeria. Nevertheless, we will ensure that we only transfer it to countries with similar or better data protection regulations as Nigeria. We will also take steps reasonably necessary to ensure that your data is treated, stored, and processed securely and in accordance with this Privacy Policy.

## What are your Rights in Relation to your Personal Information?

You have various rights in relation to the personal information of you and your ward. In particular, you have a right to:

- object to the processing of your personal information;
- request a copy of your personal information in Our possession;
- ask that We update the personal information in our possession, or correct such personal information that you think is incorrect or incomplete;
- request that we delete your personal information in our possession, or restrict the way in which we use such personal information; and
- withdraw consent to Our processing of your personal information (to the extent such processing is based on consent).

To exercise any of your rights, or if you have any other questions about our use of your personal information, please e-mail: <u>COO@charterhouselagos.com</u>. You may also use these contact details if you wish to make a complaint to us relating to your privacy; or the way we have handled your personal information.

# **Policy Review**

The school has the discretion to update this Policy at any time. When we do, we will post a notification on the home page of Our website. The changes will take effect after the notification.

We encourage you to frequently check the page for any changes and to stay informed about measures we have adopted to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this Policy periodically and become aware of modifications.

# How to Contact Us?

If you have any questions about this Privacy Policy, or any complaints, please contact our Data Protection Officer: <a href="COO@charterhouselagos.com">COO@charterhouselagos.com</a>