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***** Clonlara School Privacy Policy*****

How we use Student and Parent/Guardian (“Parent”) information

This privacy policy explains how Clonlara School (“School”) uses the personal information we collect about students and families.

Why we collect and use this information

We collect and use student and family information for the following purposes:

- a. to support student learning
- b. to monitor and report on student academic progress
- c. to assess the quality of our services
- d. to maintain relationships with alumnae and the school community, including marketing or fundraising activity
- e. to make use of photographic images of students, parents and staff 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 and media
- f. to fulfill our contractual and legal obligations
- g. to meet other reasonably necessary School purposes, such as obtaining appropriate professional advice and accreditation for the School
- h. to allow better financial modeling and planning
- i. to meet the statutory duties required by General Data Protection Regulations (“GDPR”)

The categories of student and parent information that we process may include:

- personal identifiers and contacts (such as name, unique student number, unique parent number, unique faculty number, unique contact numbers, contact details and address)
- characteristics (such as ethnicity and language)
- safeguarding information (such as court orders and professional involvement)
- special educational needs
- enrollment in other schools and programs (previous, concurrent, and future)
- assessment and academic attainment
- relevant behavioral information
- donations and volunteerism

The School holds the legal right to collect and use personal data relating to students and their families, and we may also receive information regarding them from their previous School or Local Authorities. We collect and use personal data to meet legal requirements and legitimate interests set out in GDPR, including those in relation to Articles 6 and 9.

How we collect information

Generally, the School receives personal data from the individual directly (including, in the case of students, from their parents). This may be via an online form, or in the ordinary course of interaction or communication (such as in person, phone, email or written assessments). However, in some cases personal data may be supplied by third parties (for example another School, or other professionals or authorities working with that individual); or collected from publicly available resources.

Storing and retaining data

Some education records relating to former students of the School may be kept indefinitely for legal reasons, but also to enable the provision of references for transcripts. The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

Who we share information with

We routinely provide information, with consent, to:

- schools that the students attend after leaving us
- schools requesting transcript information for admissions
- further education and work experience placement providers
- enrollment status and verification for potential employers
- Social Security Administration and disability requests

Students and parents are reminded that the School is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on safeguarding files, and in some cases referrals to relevant authorities such as Social Services or police. We do not share information with anyone without consent unless the law and our policies allow us to do so.

Keeping in touch and supporting the School

Unless the relevant individual objects, the School will use contact details of parents, alumnae and other members of the School community to keep them updated about the activities of the School, or alumnae and parent events of interest, including sending updates and newsletters, by email and by postal mail. The School may also:

Share personal data about parents and/or alumnae, as appropriate, with organizations set up to help establish and maintain relationships with the School community, such as Alumni or Parents' Associations;

Contact parents and/or alumnae by postal mail, email or phone in order to promote and raise funds for the School or other worthy causes, as appropriate;

Should you wish to limit or object to any such use, or would like further information about them, please contact the School at the contact information listed below. You always have the right to withdraw consent, or otherwise object to direct marketing or fundraising.

Your Rights

Individuals have various rights under GDPR to access and understand personal data held about them by the School, and in some cases, ask for it to be erased or amended or for the School to stop processing it, but subject to certain exemptions and limitations. Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organization, should contact the School at the contact information listed below.

The School will endeavor to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. The School will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the School may ask you to reconsider or charge a proportionate fee, but only where the law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The School is also not required to disclose any pupil examination scripts, nor any confidential reference given by the School for the purposes of the education, training or employment of any individual. Students where supported by their parents, can make subject access requests for their own personal data. A student of any age may ask a parent or other legal representative to make a subject access request on her behalf, and moreover (if of sufficient age) their consent or authority may need to be sought by the parent. Parents of students aged 18+ must generally receive permission from the student for such requests. Students younger than 18 may be sufficiently mature to have a say in this decision. All subject access requests from students will therefore be considered on a case-by-case basis. Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the School may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organization has been requested).

Whose Rights

The School will often rely on parental consent to process personal data relating to students (if consent is required) unless, given the nature of the processing in question, and the student's age and understanding, it is more appropriate to rely on the student's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances. In general, the School will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behavior, and in the interests of the pupil's welfare, unless, in the School's opinion, there is a good reason to do otherwise. However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other students, or if required by law. Students are required to respect the personal data and privacy of others, and to comply with the School's relevant policies. Staff are under professional duties to do the same, covered under the relevant staff policy.

Requesting access to your personal data

To make a request for your personal information as stated above, or to object to:

- processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing or fundraising
- have inaccurate personal data rectified, blocked, erased or destroyed

Contact: info@clonlara.org (734) 769-4511

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified herein. Consent is required for the School to process your data, but it must be explicitly given. You may withdraw consent by contacting info@clonlara.org (734) 769-4511

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