# St Andrew's School, Turi Privacy Notice

This Privacy Notice (the "Notice") aims to provide data subjects (hereafter "you" or your") with information about how St Andrew's School Turi (the "school "we or "our") collects, processes and uses all personal data howsoever collected, who we share it with and the ways in which we protect your privacy while doing so in accordance with applicable data protection laws and regulations.

1. TYPES OF PERSONAL DATA WE PROCESS

The School processes personal data from data subjects including prospective, current and former students and their parents, legal guardians, current and former employees, job applicants, professional service providers, suppliers, contractors, and third parties.

These include but are not limited to:-

- names, postal and physical addresses, telephone numbers, e-mail addresses and other contact details;
- national IDs and passport;
- marital status and family details;
- financial information
- past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks
- references given or received by the School about students, and information provided by previous educational establishments and/or other professionals or organizations working with students;

The School may also collect and process other sensitive data related to you including but not limited to:

- race, nationality and ethnic social origin;
- students' and employees' health status;
- biometric information;
- gender
- Religion

2. HOW WE COLLECT AND PROCESS PERSONAL DATA

The School will collect personal data directly from you (in the case of students, from their parents or legal guardian) unless you grant consent to obtain the data from elsewhere. This may be via a form, in the ordinary course of interaction with you, or communication such as email or phone.

However, in some cases, we will obtain personal data from third parties e.g. another school, referees, or other professionals or authorities working with you. In such an instance, we shall notify you within fourteen (14 ) days of such collection.

3. PURPOSES FOR PROCESSING PERSONAL DATA

We obtain, hold and process data for the following purposes and other purposes that are compatible with the purposes below:

- student admission and enrolment processes;
- provision of education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to students, and monitoring students' progress and educational needs;

- recruitment and employment of staff;
- give and receive information and references about past, current and prospective students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend;
- enable students take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School;
- safeguard students' welfare, provide appropriate pastoral care and comply with child protection requirements;
- provision of medical and health care services to students and staff;
- make use of photographic images of students in school publications, on our website and (where appropriate) on our social media channels in accordance with our policies;
- management planning and forecasting, statistical analysis including that imposed or provided for by law e.g. diversity or gender pay gap analysis;
- security purposes, including CCTV in accordance with our CCTV Policy;
- maintaining relationships with alumni and the School community, including direct marketing or fundraising activities;
- where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice;
- fulfilment of legal and statutory obligations.

## 4. LEGAL BASIS FOR PROCESSING DATA

We collect and use personal data for the purposes describe above and under the lawful basis that the processing is necessary for the performance of our contractual obligations with you. In some circumstances, we may have to process data for other purposes that are not necessary for the performance of our contractual obligations. In such cases, the processing may be based upon our legitimate interests, such as providing a safe learning environment, compliance with our legal obligations.

## 5. STORING AND RETENTION OF PERSONAL DATA

We apply the appropriate technical and organizational measures to ensure the security, privacy confidentiality, and integrity of your personal data, preventing from unauthorised access or unlawful processing as well as accidental loss, destruction or damage of the data.

We keep personal data for as long as necessary with regard to the purposes described in Clause 3 of this notice or for any other purposes that may be communicated to you and in line with our retention policies. Once your data is no longer required or permitted to be retained for legal or school purposes, it will be safely destroyed in line with our retention policies.

## 6. SHARING OF PERSONAL DATA

For the most part, the personal data that we collect will remain within the School, and will be processed by appropriate employees in accordance with access protocols for the purposes of delivering the services required.

For the purposes described in Clause 3 of this Notice, we may need to share your personal data externally with third parties including government authorities and agencies. For such transfers and sharing of personal data, we have implemented suitable safeguards.

7. TRANSFER OF PERSONAL DATA OUTSIDE KENYA

We will generally not transfer your personal data outside Kenya unless there are sufficient and valid reasons for doing so. Prior to such transfer, we shall ensure that either:

- valid grounds exist (as provided under section 48 of the DPA) prior to such transfer and that proper safeguards have been put in place to address the security and protection of such data; or
- we have given proof to the Data Protection Commissioner on the appropriate safeguards with respect to the security and protection of the personal data.

8. YOUR RIGHTS

The rights that you have under applicable data protection legislation are:

- To be informed of the use for which your personal data is to be put;
- To access personal data in our custody;
- To object to processing of your personal data;
- To restriction of the processing of your data;
- To correction of your data in our custody;
- To deletion of data in our custody;
- To receive personal data in a portable format where personal data is requested;
- Not to be subject to automated individual decision-making.

Where the processing of your personal data is based upon your consent, you have the right to withdraw consent at any time. Such withdrawal of consent shall not affect the lawfulness of the processing based on consent before the withdrawal.

You can exercise your rights by sending a written request together with your ID card to our Data Protection Officer at legalandcompliance@turimail.co.ke

9. CONTACT US

If you would like to discuss anything regarding this privacy notice, or you believe we are processing your personal data disregarding the data protection regulations in force, please contact our Data Protection Officer at: legalandcompliance@turimail.co.ke

10. PRIVACY UPDATES

We may need to update this privacy notice periodically so we recommend that you review this information from time to time.