

Stichting Montessori Onderwijs Zuid-Holland Privacy Statement

Effective as of June 2021.

Last change:

Stichting Montessori Onderwijs Zuid-Holland (MZH) attaches great importance to privacy. In this privacy statement, we explain which personal information we collect and use, the purpose we use it for, and the way we ensure that personal information is adequately secured. MZH consists of 5 schools, located in Alphen aan den Rijn, The Hague, Leiderdorp, and Zoetermeer, and a management office.

Privacy Policy

As a controller, MZH processes, manages, and secures personal data with the utmost care. We provide a safe learning environment for our students and a safe workplace for our staff. We do so in compliance with the requirements of the General Data Protection Regulation (GDPR) and Dutch legislation.

Proper and careful handling of personal data within the school is a prerequisite for a safe learning environment and a safe workplace. With effect from 25 May 2018, the GDPR imposes further requirements on the handling of personal data. We have therefore revised and supplemented the MZH privacy regulations and policy in compliance with the AVG. MZH means to ensure that all personal data are processed in accordance with the codes of conduct and security codes for the sector, and organisation-specific (internal) regulations.

Personal data that we process

MZH processes personal information of students, staff, visitors, and others. Some of this personal information is provided directly by the people involved, such as the names and address details on student application forms. Other personal information is compiled by us, such as student progress information and staff performance data. Finally, we receive personal information from third parties.

We process the following student details:

When registering your child, you are invited to complete the Student Application Form. Among other things, you will be asked to provide the following personal information:

Personal data of the child:

First and last name, sex, date of birth, address and place of residence, citizen service number BSN (or temporary education number), country of origin, date of arrival in the Netherlands, information about pre-school education, previous school, date of registration, date of the first school day, medication, allergies. You can also indicate whether your child needs additional support.

Personal data of the parent/guardian:

First and last name, sex, date of birth, country of origin, address and place of residence, telephone number, marital status, e-mail address, information about family composition, general practitioner, and health insurance.

Data required for teaching and guidance:

In order to be able to provide education, we record data about your child's progress at school, such as the number of the group your child is in, their grades, and progress reports. We also keep an absence register. When your child leaves school, we draw up an educational report on their academic progress and learning abilities. It contains data on results, development, behaviour, and absenteeism. We may also record school recommendations and scores from national tests (such as Cito). Sometimes, we need to process additional information in order to be able to coach your child, such as medical data (e.g., about dyslexia, ADHD, or allergies). We may also need to process personal information in order to provide (digital) learning resources. This may involve a login name and password, an IP address, your child's group and level. Furthermore, we may process personal data pertaining to you and your child in connection with your contact with the school, for example, if you have contacted us with questions or complaints, or in connection with tasks you perform for the school. When you make a payment to the school, we may process your bank account number.

Information not submitted by the pupil (or their parents or guardians) or compiled by us, has been provided by the following third parties:

- The previous school or schools of your child, if any
- Any health care providers you have authorised to inform the school about your child

We process the following staff details:

First and last name, sex, date of birth, place of birth, marital status, address and place of residence, telephone number and e-mail address, BSN (or temporary number), nationality, bank account number, copy of identity document. Data relating to current and previous employment, training and other qualifications, salary and benefits. Information regarding performance, leave, and absence.

Personal information regarding the employee's partner, if any:

First and last name, date of birth

Information not submitted by the staff member or compiled by us, has been provided by the following third parties:

Perspectief Occupational Health and Safety Service

Why we use personal information

We collect and use personal data primarily for organisational purposes. This means that we use students' personal information to provide education and offer guidance. The personal information of our staff members is only used in the context of the employment agreement.

Your and your child's personal information is used for the following purposes:

- To register your child at our school, for the purpose of admitting and placing your child.
- For organisational purposes and to enable MZH to provide education and guidance and give educational advice based on your child's progress. In this context, we are obliged to record specific information in the student monitoring system.
- To keep you informed about your child's development.
- To provide (digital) educational materials and resources.
- To facilitate the transfer of your child from our school to another educational institution.
- To calculate, determine, and collect school fees and contributions or fees for learning materials and extracurricular activities.
- For internal and external communication from and about the school, such as the school guide or a newsletter.
- For extracurricular activities such as school trips and parent activities.
- To enable parents to contact other parents.
- To allow cooperation between the schools within MZH and meet the resulting obligations.
- To answer your questions and deal with any complaints you may have, and where appropriate, to pass them on to MZH.
- To provide students with an appropriate and safe learning environment, both physically and digitally, in collaboration with MZH.
- To fulfil any legal obligations that rest with us or MZH, including but not limited to obligations arising from the Primary Education Act.

Staff members' personal details are used for the following purposes:

- In the context of the employment.
- For the payment of salaries, expense allowances, and expense claims.
- To meet any legal obligations that rest with us or MZH, including but not limited to obligations arising from tax legislation.

MZH may only process personal information if the use is in accordance with the GDPR. Processing is always based on one of the following legal principles:

- The data subject (or, in the case of children, the data subject's legal representative) has consented to the processing of personal data
- Processing is necessary for the performance of an agreement to which the data subject is a party
- Processing is necessary for compliance with a legal obligation to which the MZH is subject

- Processing is necessary in order to protect the vital interests of the data subject or of another person, such as urgent health reasons
- Processing is necessary for the performance of a task carried out in the public interest
- Processing is necessary for the purposes of the legitimate interests pursued by MZH or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection, in particular when the data subject is a child.

Security

The school takes appropriate measures to prevent abuse, loss, unauthorised access, and other undesirable activities involving personal information. For example, we store personal information in systems with limited access and use encryption. These measures are part of our Information Security and Privacy (IBP) policy.

The school has implemented the following measures:

- We have adopted a dedicated policy for the secure processing of personal information, which is periodically reviewed and, if necessary, amended.
- The school has put in place an authorisation system to ensure that only authorised staff can gain access to personal information.
- The school ensures that system access is secured by means of an adequate, state-of-the-art password policy.
- Measures are in place to protect personal information against risks arising from processing information, in particular from the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal information that is transmitted, stored, or otherwise processed.
- The school has taken measures to identify weaknesses in the processing of personal information in the systems used to provide services to the educational institution.
- A protocol is in place for dealing with security incidents.

Storage

The personal data collected is kept no longer than legally required. We usually delete student and staff data two years after deregistration unless the school is forced to comply with a longer statutory retention period.

Most of the information processed by the school is destroyed two years after deregistration. Different time limits apply to information contained in the student records (5 years) and to information related to the referral of a student to a school for special needs education (3 years).

Staff-related information processed by the school is normally destroyed two years after the staff member has left the school. Other time limits apply to payroll tax declarations and copies of identity documents (5 years) and to information regarding marital status, distance travelled to work, salary administration, and agreements regarding salary and terms of employment (7 years).

Does the school share personal information with third parties?

We only share personal information with third parties if this is required to perform an agreement, comply with a legal obligation, or perform a task of public interest. Agreements are made with processing organisations to ensure that your information is adequately secured. The school also uses cloud services storing data on a server abroad. We only do so if the data protection level is adequate.

We only share your personal information with third parties in specific circumstances. We may do so when the purposes described in this privacy statement require us to do so, and, more specifically, only in the interest of providing education and monitoring the education quality.

Public Bodies

We may need to share your child's personal information with public bodies if necessary for the performance of a task in the public interest or a legal obligation. This may, for instance, concern information that we are forced to share with the competent authorities, such as the Dutch Inspectorate of Education, the Education Executive Agency DUO, or the Regional Health Service GGD. It may also concern public bodies entrusted with a task of public interest, such as the Dutch Youth and Family Centre. We will also need to share your child's personal information with the new school when your child transfers to another school; this information is part of the educational report. If domestic violence is suspected, we need to report our suspicions to Safe at Home (Veilig

Thuis) or another competent authority. In case of frequent unauthorised absence, we need to notify the school attendance officer and share the information they need to do their work. The public body receiving the information is an independent processor and must comply with the applicable privacy obligations.

External Suppliers

We use a number of third-party services in support of our education efforts. These third parties may process personal information pertaining to you or your child. For example, MZH has entered into agreements with external suppliers of record-keeping systems and student monitoring systems, such as ParnasSys from Topicus.

Other Parents

Furthermore, with your consent, we may share your and your child's personal information with other parents, for example, in a class list or via online communication networks (such as communication apps). We have no control over the further processing of your personal data by third parties who become aware of the information in the class list or said communication networks.

When we share personal information with third parties, this personal information will not be processed outside the European Economic Area unless additional agreements have been made with these third parties or measures have been taken to ensure that your and your child's privacy is guaranteed.

Reporting Abuse

Your information will also be processed if you report wrongdoing in our organisation. For this reason, you may also file a report of wrongdoing with our school's designated officer. You can contact this person confidentially. Your information will not be shared with the school management without your consent. For more information on this procedure, please refer to the Complaints Procedure adopted by our organisation (to be found on the MZH website).

What are my rights?

You have the right to object to the processing of your data, revoke previously given consent, and to view, correct, or delete your data. You may also ask the school to limit the processing of your personal information or to transfer your information to yourself or a third party.

Do you wish to exercise any of these rights, or do you have any questions about how we deal with privacy and personal information? Or do you have a complaint about the way we process personal information? Please contact the director of your child's school. You can also contact our Data Protection Officer, Mr Jeroen Bosman, at fg@privacyopschool.nl. In the unlikely event that we are unable to resolve the matter, you can also file a complaint with the supervisory authority, the Dutch Data Protection Authority, via (<https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens>)

Under the law, every data subject can exercise certain rights with regard to their personal data. For example, you have the right to access, rectification, and deletion of your personal information. You may also exercise these rights on behalf of your child. Furthermore, you can object to the use of your or your child's information, or request that the use be restricted. If you intend to exercise these rights, please address your request to the headmaster of your child's school. Indicate clearly which personal information you want to see, rectify, or supplement.

We will send you the requested data within 4 weeks or process the requested rectification or deletion within 4 weeks. However, requests cannot be granted in contravention of legal provisions or if there are compelling reasons not to do so. One such example is the request to delete data while the school has to hold on to the information because of the statutory retention period. In such a case, we will contact you and explain why your request cannot be met (in full). Again, we will do so within 4 weeks of receiving your request. In principle, we do not charge a fee for dealing with your request. If we believe that fulfilling the request places a disproportionate burden on our organisation, an exception may be made. This may be the case, for example, if you make several requests for information in a short period of time without a specific reason, or if you ask for additional copies of information that has already been provided.

Automated decision-making

The school does not use automated decision-making for decisions that may legally or significantly affect the data subject. (This refers to a decision-making process without human intervention that may significantly impact the data subject, such as the automated rejection of applicants).

Amendments to the Privacy Statement

We reserve the right to amend this Privacy Statement. Any revised versions will be posted on this website. When a revised version is posted, we will notify users and provide information about the main changes. We will also indicate the date of the latest amendment.

The general contact details of MZH are:

website: www.montessori-mzh.nl