

Privacy Statement Winford (English translation)

Below is the English translation of Winford's privacy statement, where there is ambiguity due to the translation, the Dutch version is leading.

1. Introduction

This Privacy Statement describes the processing of personal data carried out by Winford's schools.

The document is still under development. This document is intended for all (potential) pupils involved and their parents/guardians and describes for each category the type of processing, why it is carried out, which personal data is processed and to whom that data is provided. In addition, the rights of the data subjects are explained. With this Privacy Statement, we comply with the requirements of the Personal Data Protection Act (GDPR).

Winford regularly carries out risk analyses as part of its information security policy. Based on this, measures are taken or strengthened to ensure that the availability, accuracy of and lawful access to information is guaranteed. Important principles with regard to the safeguarding of lawful access to personal data, i.e. the protection of privacy, are:

- Employees are aware of the risks related to the processing of personal data
- Employees are aware of agreements regarding the processing and security of personal data
- Employees can only view or edit the personal data of students that is necessary for the performance of their work.
- In addition, Winford has a protocol for reporting data breaches and good agreements with regard to information security with suppliers who process data on behalf of Winford.

2. Privacy of students and their parents/guardians

2.1. When logging in

During the registration process, i.e. before a student is enrolled, personal data of students and parents/guardians is collected. This data is collected in order to:

- Be able to identify the student
- Verify whether a student can be admitted and placed
- Communicate with the student and/or his/her parents/guardians
- To be able to collect the tuition fee upon final enrolment

The data that is collected and stored are:

- Surname, first names, gender, date of birth, country of origin, religion, address details and similar data required for communication of the pupil
- Surname, first names, address details and similar information required for communication of the parents/guardians of the pupil, as well as the relationship to the pupil and the bank account number
- Details of the previous school and school career
- Family composition
- Sports, hobbies and other talents
- An administration number (BSN) of the student
- Data that is necessary in relation to the student's health or support needs, such as physical/mental health and dyslexia or ADHD
- Data necessary for calculating, recording and collecting tuition fees and contributions or fees for educational resources and extracurricular activities.

2.2. During the enrolment period on Winford

During the period that a student is enrolled at Winford, data about the student is also stored.

This data is collected in order to:

- To follow the student in the progress he or she makes and to be able to promote the student to the next class
- To be able to follow the student's behaviour and circumstances, including absences, doing homework
- To be accountable to Compulsory Education that the student is in school
- Inform DUO (Dutch Governmental Education Administration) about the student's results and make it possible for a student to pass the final exam
- Communicate with the student and/or his/her parents/guardians

The data that is collected and stored are:

- Surname, first names, gender, date of birth, country of origin, religion, address details and similar data required for communication of the pupil
- Surname, first names, address details and similar information required for communication of the parents/guardians of the pupil, as well as the relationship to the pupil and the bank account number
- Details of the previous school and school career
- Family composition
- Sports, hobbies and other talents
- An administration number (BSN) of the student
- Data that is necessary in relation to the student's health or support needs, such as physical/mental health and dyslexia or ADHD

Within the school, the following types of employees have access to this data:

- Teachers and Coordinators
- Deans
- Mentors
- Directors
- Administrative Assistants
- Application Administrators

Not all roles have access to all data. For each role, it has been determined which data can be viewed and changed, looking at what data that role needs in order to be able to carry out his or her work. Data that is not necessary for this purpose cannot view or change that role.

The data is provided to the following third parties:

- The municipality on the basis of a legal obligation regarding compulsory education.
- The Education Executive Agency on the basis of a legal obligation to register.
- Processors in the sense of suppliers of form and administration systems who, on behalf of the school, provide access to and management of the digital systems used for school administration.
- External educational institutions when students are placed outside the school, because they need extra guidance that cannot be provided at the school. Parents/guardians will be asked for permission before they are issued.
- Agencies that provide care for only those pupils where applicable and only when this is necessary for the guidance. Parents/guardians will be asked for permission before they are issued.

2.3 Technical and organisational security measures

Registration data is temporarily stored on a handwritten or digital form and in our system after registration. An access policy has been drawn up for both the registration form and our systems that specifies which functions are allowed to access which data. This policy is reviewed annually. Logging into the systems is only reserved for employees who are employed by Winford. A so-called processing agreement has been concluded with all suppliers, in which agreements have also been made about security and back-up of the data.

2.4 Rights of data subjects

If you wish to view or change your personal data, you can contact Winford's ICT department, which can be reached at: privacy@winford.nl. Depending on the work required to make data available, a fee of max. €25.00. Of course, this does not apply to the notification of changes.

2.5 Retention periods

The data from the student file will be stored for a maximum of 2 years after the student has been deregistered. If the registration does not lead to registration, the data will be deleted within 12 months of the written announcement about the decision of the school management or withdrawal of registration by parents/guardians.

3. Privacy of website visitors

3.1. Scope of this privacy statement

This privacy statement also applies to personal data generated by your visits to Winford's websites or by telephone or verbal request for information. You agree to our privacy policy by using these websites.

3.2 Personal data

For the purpose of our services, Winford records data in one or more files with your permission. Winford may collect personal information through its websites for the following purposes:

- Sending information and invitations about information activities and open days, etc.
- Sending newsletters and/or correspondence to persons who have requested it.
- Winford handles your personal data with care. Personal data is processed and secured in accordance with the General Data Protection Regulation (GDPR).

3.3 Click behaviour and web statistics

Winford measures, among other things, the extent to which its websites are visited as well as the click behaviour on our website(s). To this end, we keep general data of visitors. This includes the most visited pages, surfing behavior and the type of web browser of the visitor. On the basis of web statistics, it is examined how the provision of information and navigation structure can be improved. This information cannot be traced back to you and your identity will remain protected.

3.4 Provision of data to third parties

Personal data will not be provided to companies and institutions outside Winford, unless Winford does so in the context of legal obligations.

3.5 Sites linked to Winford websites Winford

Our website contain links to sites that are not created by or on behalf of Winford. Winford is not responsible for the content of linked sites and how those sites treat your personal information.

Section 3.6.

Winford uses security or safety procedures that include the purpose of ensuring that only authorised persons have access to your personal information.

3.7 Retention period

Winford will retain your data for as long as it remains current for the purpose, or purposes that are not incompatible with it, for which we collected your data.

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