

## PRIVACY NOTICE

**AVENOR COLLEGE** processes personal data on its prospective, current and former students and their parents or legal representatives, as part of its everyday operations of providing educational services.

AVENOR COLLEGE handles your personal data according to the General Data Protection Regulation no. 679 / 2016 applicable in the European Union (“**GDPR**”). For these purposes, AVENOR COLLEGE acts as controller with regard to your personal data and the personal data of students (“**Personal Data**”), meaning AVENOR COLLEGE establishes the purposes and means of processing the Personal Data.

For the purposes of this Privacy Notice, please note that the term “*processing*” shall represent any operation performed on Personal Data, whether or not by automated means such as collection, recording, storage, adaptation, alteration, consultation, use, disclosure by any means, erasure or destruction.

AVENOR COLLEGE wishes to be completely transparent with regard to the processing of Personal Data and therefore, we have presented below all the information you may need on this subject matter.

Please take a little of your time to read this privacy notice to understand the data processing operations carried out by AVENOR COLLEGE.

### 1. The purposes for which AVENOR COLLEGE processes your Personal Data

AVENOR COLLEGE processes Personal Data that pertain to you or to the students for the following purposes:

- **Provision of educational services**, starting with the application process, enrolling students, administration of classes and timetable, teaching activities, administration of internal and public examinations, assistance regarding the application process to various universities, issuance of academic records.
- **Provision of educational ancillary services**: pastoral care, career and personal counselling, library services, extracurricular activities, school trips, managing school’s publications, setting up the virtual learning environment and granting access to AVENOR COLLEGE’s Intranet and Internet network as well as monitoring the use of AVENOR COLLEGE’s network.
- **Ensuring campus security**: monitoring access on campus, performance of video surveillance.

- Provision of the **medical care and counselling** that students may need.
- **School administration:** handling student records and other academic documentation, administration of fees and accounts, internal audits and controls, reporting and statistics creation, implementing school policies, ensuring collaboration with other schools, archiving, assessing the quality of our services, facilitating research activities.
- **School related communications:** conveying various messages related to the students and AVENOR COLLEGE's activities by any communication means.
- Organizing **fundraising activities** and other school events (e.g., concerts, theatre productions, talent shows), including marketing communications related to the fundraising activities organized by AVENOR COLLEGE.
- Dispute resolution and litigations.

## 2. The categories of Personal Data that AVENOR COLLEGE processes, include, but are not limited to the following:

- Identification and contact information (first and last name, citizenship, country of birth, address, information included in ID's / passports, phone number, e-mail etc.); Bank details;
- Health data: medical history, allergies, immunization records, disorders, medical examination results and other medical data of the students;
- Data related to the educational background and regarding school performance of the students: academic, disciplinary or other educational related records, academic references, special needs, hobbies, results of educational diagnosis testing, test results, feedbacks, evaluations etc.;
- Behavioural data as well as data on preferences / interests of students;
- Family information: household information, language background, profession and workplace of parents etc.;
- Authentication and physical access data: e-mail, passwords, badge number, location data, other on-line identifiers, car details etc.;
- Photos and videos.

Generally, the Personal Data held by AVENOR COLLEGE were provided directly by the parents or resulted from the interaction the parents and the students have with the school. In some cases, third parties (e.g., representatives of former schools attended by students) supply data.

### 3. The lawful basis for the processing operations we conduct with regard to the Personal Data

AVENOR COLLEGE collects and further processes Personal Data, based on one of the following legal grounds, expressly laid down by the GDPR:

- The **consent** you have granted us, prior to any processing of the personal data, for:
  - the use of students' photographs and videos in various school publications, on AVENOR COLLEGE's website and social media pages;
  - the use of your contact details for direct marketing communications on AVENOR COLLEGE's fundraising activities;
  - other consents that may be granted from time to time for various processing activities.
- For the **performance of the enrolment contract**, as well as in order to take steps at your request for entering into the enrolment contract and to further provide the educational services.

Please note that there are some mandatory categories of personal data necessary to AVENOR COLLEGE in order to conclude the enrolment agreement and provide the educational services to students at a high standard and in the best interest of the students.

The mandatory categories of personal data are included in the application form, which you have filled in on-line and listed in the enrolment contract you already have / will sign with AVENOR COLLEGE. All the categories of data that are compulsory for contract conclusion are marked accordingly in the application form.

Please take into consideration, that all the mandatory categories of data are necessary for AVENOR COLLEGE to be able to evaluate your application and finally to enrol your child. Failure to provide all the information marked as mandatory will lead to the impossibility of AVENOR COLLEGE to process your application and to enter into a contract with you.

- A **legal obligation** that requires AVENOR COLLEGE to process your Personal Data (e.g. for invoicing).
- For the **performance of a task carried out in the public interest**, considering that AVENOR COLLEGE provides educational services, regarded as a service of public interest, according to the Romanian applicable provisions on education, many processing operations conducted by AVENOR COLLEGE that are strictly related to educational purposes will be founded on this lawful basis for processing. We refer here mainly to issuing and storing academic records, evaluating students' performance etc.
- The **legitimate interest pursued by AVENOR COLLEGE**.

AVENOR COLLEGE relies on this legal ground in order to provide the educational services it has committed to deliver and additional services related to this scope at the highest standards, always for the benefit of the students and without outweighing the parents or the students' rights and liberties.

AVENOR COLLEGE may invoke the legitimate interest legal ground in the following cases:

- monitoring use of the AVENOR COLLEGE's virtual learning environment and network, including monitoring the use of e-mails account provided by AVENOR COLLEGE;
- conducting fundraising activities, including marketing of such activities;
- enforcement of legal claims, addressing complaints and third party controls;
- management, control, reporting and performing statistics on schools activity;
- ensuring security;
- maintaining close relationships with alumni and AVENOR COLLEGE's community;
- collaboration with other schools and educational institutions;
- performance of agreements with suppliers, including insurance suppliers;
- access to grants and other funding sources.

With respect to the processing of the ***special categories of personal data under the GDPR***, respectively health data, please take into consideration that AVENOR COLLEGE processes **health data** based on the following legal grounds:

- The necessity of the Medical Office to process such data for the **purpose of preventive and occupational medicine, medical diagnosis and the provision of health or social care or treatment** on the basis of European Union or national law;
- Processing is necessary for reasons **of substantial public interest, on the basis of European Union or national law**. Such a legal ground is used especially in those situations where the school has to assess the learning capacity of a student and adapt the teaching activities to the special needs of a student.
- The **explicit consent** granted by you for the disclosure of the personal data of students related to the allergies they suffer from.

## 4. Disclosure of Personal Data

AVENOR COLLEGE discloses your Personal Data only to those members of AVENOR COLLEGE, staff and collaborators, who need access to the personal data mainly for ensuring the provision of the educational and ancillary services. In this respect, please take into account that only the Medical Office has access to the students' medical records. Other departments of the school have access to specific health data based on the consent you have expressed (i.e. for allergies) or in order to protect a substantial public interest based on Union or national law (e.g., various medical conditions triggering special learning needs).

With respect to the disclosure of your Personal Data to third parties, outside AVENOR COLLEGE, please note that such disclosure is performed solely in the regular activity of the school. The categories of recipients include the following:

- IT providers, including educational applications, online learning tools, email marketing platforms such as MailChimp or information management systems like Engage by Double First, etc.
- Cafeteria Owner in its capacity of independent provider of meal services on campus;
- Other educational institutions or organizations, not limited to other schools;
- Travel agencies, catering and transportation providers;
- AVENOR COLLEGE's photographer and video crew;
- Courier services providers;
- Utilities services providers;
- Public authorities and institutions, national or foreign, judicial courts and foreign embassies or other forms of diplomatic missions;
- Tax, legal and accounting consultants.

## 5. Third country transfers

AVENOR COLLEGE transfers students personal data to third countries as follows: *United Kingdom* – to Cambridge International Examinations.

## 6. Retention of Personal Data

AVENOR COLLEGE holds all your Personal Data for as long as you are in a contractual relation with us, and afterwards the maximum standard period set by legislation for each category of personal data. AVENOR COLLEGE keeps the student file and all the data related to the student interaction with AVENOR COLLEGE mainly for the scope of assessing the school's activity and the quality of services provided but also for addressing potential request of students with regard to their school trajectory within AVENOR COLLEGE, which usually appear after the students have graduated.

Notwithstanding the retention period, please be informed, that all the academic records and other school acts and documents related to study activities are kept for an indefinite period of time, according to the legal obligations that AVENOR COLLEGE has in this respect. Moreover, in any case where a legal provision imposes a minimum retention period, AVENOR COLLEGE will keep the Personal Data for at least that mandatory period.

## 7. Your rights related to the processing of Personal Data by AVENOR COLLEGE

The GDPR provides certain rights related to the processing of personal data, that both you and the students have. In this respect, please be informed that students that have an appropriate level of understanding could exercise the rights listed in this section, individually.

AVENOR COLLEGE respects all the rights mentioned under the GDPR and is committed to furnishing the appropriate means by which you can exercise these rights, according to the details mentioned below:

The **right of access**, which entails your possibility to obtain the confirmation from AVENOR COLLEGE whether your Personal Data is being processed by AVENOR COLLEGE or not, and if the case may be you are entitled to solicit access to this data, as well as additional information regarding the Personal Data, such as: the purposes of processing, the categories of recipients the Personal Data are being disclosed to and the envisaged retention period. In the situations where you may need to exercise the right of access, please consider contacting AVENOR COLLEGE and requesting confirmation or access to your Personal Data by completing our Access to Personal Data Request Form and submitting it by e-mail. Please consider that there might be specific situations that are exempted from the right of access, such as information that identifies other individuals or which is subject to confidentiality obligations.

- The **right to rectification**, that allows you to request AVENOR COLLEGE rectification of any inaccurate Personal Data that AVENOR COLLEGE may hold, as well as to have your incomplete Personal Data to be completed.
- The **right to erasure** meaning that in the situations expressly regulated by law, you may request erasure of your personal data. Please take into account, that the cases where the law provides for the possibility of erasure of personal data amount to the situations where the processing is unlawful or where the processing is based on your consent, and you have withdrawn such consent.
- The **right to restriction of processing**, signifying your right to obtain restriction of processing your Personal Data from AVENOR COLLEGE's part. Please bear in mind that this right can be exercised only in specific situations laid down by the GDPR such as when you challenge the accuracy of your Personal Data. During the period necessary for us to rectify your data, you may ask us to restrict the processing of your Personal Data.
- The **right to data portability** implying your right to receive the personal data in a structured, commonly used and machine-readable format and further to transmit such data to another controller. This right to data portability shall be applicable only to the personal data you have provided to us and where the processing is carried out by automated means based on your consent or for the performance of the contract you have concluded with AVENOR COLLEGE.
- The **right to object** to the processing of your Personal Data by AVENOR COLLEGE, on grounds relating to your particular situation. The right to object applies to the situations where AVENOR COLLEGE relies on

consent as legal basis for processing (e.g. using your e-mail address for conveying fundraising related messages).

- The **right to lodge a complaint** designates your right to challenge the manner in which AVENOR COLLEGE performs processing of your Personal Data with the competent data protection authority.
- The **right to withdraw your consent** given for various processing operations, in cases where the consent represents the lawful basis for processing. In cases where you withdraw your consent to processing your Personal Data, please note that the processing will end from the moment the withdrawal takes place without any effect on the processing that took place prior such withdrawal.

## 8. Profiling

AVENOR COLLEGE may create and use profiles to evaluate the performance of its students, to identify gaps in their development or to assess specific traits that characterize students' personality, preferences, and behaviour or professional inclinations.

## 9. Video Surveillance

AVENOR COLLEGE has implemented a video surveillance system on the campus, in order to ensure security of its students, staff and all the other persons that enter our premises. The security and wellbeing of our students is our primary concern and these video cameras allow us to offer real time protection.

## 10. Contact Point

In the situation where you may wish to exercise any of the rights listed under point 7 of this Privacy Notice or to obtain additional information or clarifications on the subject of processing your Personal Data, please contact AVENOR COLLEGE, *via its appointed Data Protection Officer* – responsible for ensuring that AVENOR COLLEGE complies with all the requirements of the GDPR.

**Contact Details of AVENOR COLLEGE's Data Protection Officer:**

Email: [office@avenor.ro](mailto:office@avenor.ro)

---

The present Privacy Notice shall apply along with other policies / procedures adopted at the level of AVENOR COLLEGE, such as:

- Video Surveillance Policy;
- Record Retention and Disposal Policy;
- Policy on Publication of Photographs and Video Recordings;