



HSV Foundation
Privacy Statement for pupils and parents
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Contact details

Data controller

Stichting Haagsche Schoolvereniging

Executive director of the foundation: Ms I.M.T. La Haye

Contact details

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Contact details of the Data Protection Officer

Privacy at School

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Introduction

Everyone has the right to privacy, which is why personal data must be properly protected. As an educational institution, the HSV Foundation processes personal data relating to you and the pupils, and we attach great importance to protecting this data. We handle personal data with the utmost care and comply with the law. You can rest assured that your data and that of the pupils is safe with us. The HSV Foundation offers pupils a safe learning environment, including in terms of privacy.

In this privacy statement, we inform you about how we handle your personal data and that of the pupils. Among other things, you can read about the purpose for which we collect and use personal data, the legal basis for this, what personal data we process, and how we handle personal data securely. You will also find information on how long we retain the data and what your rights are.

Why do we process your child's data?

Purposes and legal basis for processing

We process pupils' personal data in order to fulfil our obligations as an educational institution. This is primarily to organise education, provide teaching and offer guidance. We process data where there is a lawful basis for doing so.

Most processing is carried out on the basis of a **legal obligation** or a **task in the public interest** (public task) for the following purposes:

- to enrol the pupil at our school, for the purposes of admission and placement at our school;
- to provide education and guidance;
- to keep records of progress and results;
- to provide advice on education based on progress;
- to keep you informed about their development;



- to facilitate your child's transition from our school to another (secondary) educational institution in the UK or abroad;
- for the calculation, recording and collection of school fees, the voluntary parental contribution and/or fees for extracurricular activities;
- for the purpose of organising extracurricular activities such as school trips and activities for parents;
- to answer queries and handle any complaints;
- to provide pupils with a suitable and safe learning environment, both physically and digitally;
- for the purpose of recording attendance and absence in connection with compulsory education.

In addition, we process pupil data on the basis of **legitimate interest**. The purpose of the processing is for the benefit of the pupil/parents, and robust security and minimal data processing are always paramount.

Objectives:

- Providing education using digital learning tools and (digital) teaching materials in line with the educational vision.
- Internal and external communication from and about the school, such as the school guide or a newsletter.
- Collecting the parental contribution.
- Monitoring the reliability, integrity and availability of the data.
- The use of photos and videos for internal communication (e.g. in the school app or a secure environment).

Consent

Data may also be processed on the basis of **consent** for the following purposes:

- Informing parents and pupils with visual material about activities and developments at and around the school and/or educational activities (visual material on e.g. websites, school guide, newsletter).
- Providing special support or making special arrangements in connection with a pupil's health (recording health data only at the request of parents/carers).

You have the right to withdraw your consent at any time

Any further processing of personal data for a purpose other than that for which the data was collected will not take place without first informing you and, if necessary, seeking your consent.

What data do we process?

Personal data

We process various personal data, some of which we receive directly from you as a parent(s) and/or carer(s). This data is provided during registration, enrolment, the intake and when signing agreements. This includes name, date of birth, National Insurance number, contact details

We collect some of the personal data we process ourselves, such as:

- pupils' progress data
- data on the nature and progress of education and support, and the results achieved;
- internet data & user rights data
- data on participation in activities;
- photos and videos of pupils and staff (only with consent).

Data that we have not received from parent(s) and/or carer(s) and have not collected ourselves has (where applicable) been obtained from the following sources:

- your child's previous school



- care providers to whom you have given permission to inform the school

Special categories of personal data (such as health data, religious beliefs)

The school may process pupils' health data where necessary to provide special support required by a pupil or to make special arrangements in connection with a pupil's state of health (Art. 30(2)(a) UAVG). Health data may also be processed to enable appropriate action to be taken in emergencies.

In all other cases, the processing of special categories of personal data will only take place with your explicit consent.

Data from website visitors

Our website automatically processes certain data, including:

- IP address (anonymised where possible);
- device and browser information;
- functional and analytical cookies;
- information that you provide yourself via the contact options.

External links on the website

Our website contains features that may process personal data:

- Email links: clicking on an email button opens your own email programme. We only receive data once you send the email.
- Contact links to schools: clicking on these will redirect you to an email address or contact page for the relevant school.
- Google Maps locations: Google may process location and usage data in accordance with its own privacy policy.
- Photos and videos on the website: these are only posted with the consent of parents/guardians.

For a more complete overview of the personal data processed, please refer to Appendix 1.

With which parties do we share data?

Third parties

In a number of cases, we share personal data with other data controllers (third parties), the most common of which are: the SPPOH partnership, the school attendance officer, the local authority, the GGD, the Youth and Family Centre, the accountant, DUO, and the Education Inspectorate.

We only share data with third parties where there is a legal basis for doing so, i.e. where this is necessary to comply with a legal obligation or for the performance of a contract, for the performance of a task carried out in the public interest, or on the grounds of a legitimate interest. In other cases, you will be asked for your consent. We only share the data that is necessary.

Processors

We may request (commercial) parties to assist with the processing of data. The main processors for the HSV Foundation are the suppliers of digital education systems, teaching methods, learning materials and tests. In addition, the HSV Foundation uses processors for the purposes of (student) administration.

This processing always takes place on behalf of and under the responsibility of the HSV Foundation. We enter into agreements with these processors, which set out, among other things, what data is processed, how long it is processed and stored, and how this data is secured.



When we share personal data, this personal data will not be processed outside the European Economic Area, unless additional agreements have been made or measures have been taken to ensure that your privacy and that of your child is safeguarded.

For an overview of the main processors, please refer to Appendix 2.

What security measures do we take?

The HSV Foundation takes appropriate measures to prevent misuse, loss, unauthorised access and other undesirable actions involving personal data. For example, we store personal data in systems with restricted access and use encryption.

The following measures have been implemented:

- There is an appropriate policy in place for the security of personal data processing, which is periodically reviewed and, where necessary, updated.
- Only authorised staff may access the personal data required for their duties.
- Access to systems is secured by means of an appropriate password policy that is in line with the state of the art.
- Various measures have been taken to protect personal data against processing risks, particularly those arising from the destruction, loss, alteration or unauthorised disclosure of, or unauthorised access to, data transmitted, stored or otherwise processed, whether accidentally or unlawfully.
- Measures to identify vulnerabilities regarding the processing of personal data in the systems used to provide services to the educational institution.
- There is a protocol setting out how to respond in the event of security incidents.

In the unlikely event that something should happen to your personal data causing you personal harm, we will inform you immediately.

What retention periods do we apply?

Personal data collected is not retained for longer than is necessary for processing. The retention period is determined by the purpose for which the HSV Foundation collected the data and by any legal obligations to retain data for a specific period.

Most data processed by the school is destroyed two years after the pupil has left. Different retention periods apply to data in the pupil records and – in the event of a transfer to another school – the educational report (five years). For financial and tax data, and for funding purposes, a retention period of seven years after leaving the school applies.



Data categories	Examples	Retention period	Basis / Explanation
General student data	Name and address details, contact details, National Insurance number	2 years after deregistration	Necessary for administrative processing and legal obligations
Student file	Test results, reports, development data	2 years after leaving	Education sector guidelines; no longer retain data than necessary
Educational report	Transfer data when changing schools	5 years	Statutory retention period for transfer information
Pupil records	Enrolments, placement information	5 years	Legal obligations and audits by the inspectorate/DUO
Financial and tax details	Parent contributions, invoices, payments	7 years	Statutory tax retention obligation
Health data	Medical information for support	Until the end of the school career or shorter if no longer required	Retain only for as long as necessary to fulfil the duty of care
Photos and videos	Publications on the website, newsletter, school guide	Until consent is or for a maximum of 5 years	Parental consent; Delete upon withdrawal
Website data	IP addresses, cookies, log files	6 months to 2 years (depending on the cookie)	Functional and analytical purposes
Correspondence	Emails from parents/carers	1 to 2 years	Necessary for handling communication and complaints

What are your rights?

Parents and carers of pupils under the age of 16 have a number of rights regarding personal data. These rights are enshrined in law. You may exercise these rights at any time.

Right of access, rectification, erasure and restriction of processing

As the data subject, you may always submit a request to access the data we process about your child(ren). You have the right to supplement or correct inaccurate data. We will then ensure that this data is also updated with organisations with whom we share and/or exchange this data.

If you request us to restrict the processing of your child's data or to erase data, we will assess whether this is possible. In this assessment, we will comply with the legal requirements and check whether we have any legal obligation to retain the data.

Right to data portability

You also have the right to have the data we process about your child and which we have received from you transferred to you or, at your request, to another organisation.

Right to object

You have the right to object to the processing of personal data in specific situations. This does not apply to general or principled objections. In most cases, a balancing of interests will need to be carried out.



Right to object to automated decision-making and profiling

Sometimes personal data is processed automatically, and decisions are made on that basis. As a parent, you may refuse this in the interests of your child. The school does not use automated decision-making that has legal consequences for the data subjects or significantly affects them (i.e. decision-making without human intervention that has major consequences for the data subject, such as the automatic rejection of job applicants).

Right to lodge a complaint with the AP

If you have any questions about how we handle your child's data, please contact the school's headteacher. You can also contact our data protection officer at any time via the email address info@hsvdenhaag.nl

You may also contact the Data Protection Officer (DPO) with any questions and/or complaints regarding personal data. You may approach this external officer in confidence. Your details will not be shared with the school management without your consent. See the [contact details](#).

In the unlikely event that we are unable to resolve the matter together, you may lodge a complaint with the Dutch Data Protection Authority: (www.autoriteitpersoonsgegevens.nl).

How can I exercise my rights?

If you wish to exercise the rights described above, the following procedure applies:

- You may submit your request digitally or in writing to the school principal.
- Only a pupil's legal representatives are authorised to submit a request. The identity of the applicant must be clear. The headteacher may therefore ask for valid proof of identity to verify your identity.
- Stichting HSV will respond to your request within one month of its submission. Stichting HSV may inform you, stating the reasons, that more time is required and extend this period by a maximum of two months.

Privacy statement version

We reserve the right to amend this privacy statement. We will publish any revised versions on this website. If a revised version is published, we will provide a clear notification of this, including information about the most significant changes. We will also indicate when the statement was last amended.



Appendix 1: Overview of processed personal data

Category	Explanation
Contact details of pupil and parent(s)/carer(s)	name, gender, date of birth, address, email address, telephone number and similar data required for communication
Student number	an administrative number that identifies students
Nationality and place of birth	
Medical details	data necessary for the health or well-being of the student, insofar as this is relevant to taking additional measures to enable them to follow education effectively (e.g. extra time for tests); or at their own request
Student progress	<p>data concerning the nature and progress of the education, as well as the pupil's progress and results achieved, namely:</p> <ul style="list-style-type: none"> • Recommendation from primary school regarding secondary school • Results data • Educational support data • Data regarding attendance (attendance records) • Care support data/(health data) • Class, year group, type of education or teaching method
Educational organisation	Data for the purpose of organising education and providing or making learning materials available
Finance	data for the purpose of calculating, recording and collecting school fees, voluntary parental contributions or fees for extracurricular activities
Visual material	photographs and video footage (with or without sound) of school activities or for identification purposes. In addition, visual material for the supervision and professional development of teachers.
BSN/PGN	The pupil's BSN number must be recorded upon enrolment. The school refers to this number as the personal identification number (PGN).
Chain ID (ECK-ID)	A unique ID for the 'educational content chain'. This enables educational institutions to share data without it being directly traceable to pupils
Internet data	IP address, online browsing behaviour, cookies, diagnostic data (log and monitoring data, metadata)
User rights data	Rights per user and how those rights are used (logging/log files)



Appendix 2: List of key data processors

Name of processor (in alphabetical order)
Basispoort Foundation
Cito B.V.
Heutink Primary Education B.V.
Kennisnet Foundation
L.C.G. Malmberg B.V.
Topicus Education Ltd
Wis Services Ltd

