



St. Edward School DATA PRIVACY MANUAL

Effectivity Date: May 31, 2019 of SY 2019-2020

INTRODUCTION

St. Edward Integrated School Foundation – Cavite Incorporated (Imus Campus / Faith Campus / Charity Campus / Hope Campus) hereinafter referred to as “**St. Edward School**”, offers a number of services to provide timely information to students and parents via written, electronic, and online services. **St. Edward School** values the privacy of its students, parents and employees and is committed to protect the personal data that they have shared with the school. In this regard, it is the policy of **St. Edward School** to uphold data privacy rights, and ensure that all data collected from students, their parents or guardians, employees and other third parties, are processed pursuant to the general principles of transparency, legitimate purpose and proportionality as espoused by the Republic Act No. 10173, otherwise known as the “*Data Privacy Act of 2012*”, its Implementing Rules and Regulations, and other relevant policies and issuances of the National Privacy Commission. This privacy statement describes what personal information is collected, how it is collected, how it is used, how it is protected, to whom it is disclosed, and how it is retained.

DEFINITION OF TERMS

Authorized Personnel – persons who are formally and properly empowered to perform specified duties associated with an office or an agreement or contract.

Consent of the Data Subject – freely given, specific, informed and unambiguous indication of the data subject’s agreement to the processing of his or her personal data. Consent must be given by a statement or a clear affirmative action.

Data Protection Officer – person responsible for overseeing data protection strategy and implementation to ensure compliance with the National Privacy Commission’s requirements as prescribed by NPC Advisory 2017 – 01 series of 2017.

Data Subject – An individual whose Personal Data is collected and processed;

Personal Data – All types of Personal Information;

Personal Information – Any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained

by the entity holding the information, or when put together with other information would directly and certainly identify an individual;

Process, Processed or Processing – Any operation or any set of operations performed upon Personal Data including, but not limited to, the collection, recording, organization, storage, updating, modification, retrieval, consultation, use, consolidation, blocking, erasure, or destruction of data.

Sensitive Personal Information – Personal information including, but not limited to, an individual's race, ethnic origin, marital status, age, color, religious philosophy, political affiliation, health, education, financial information and other government identification numbers;

RIGHTS OF DATA SUBJECT

St. Edward School is committed to protect the privacy rights of individuals on personal information pursuant to the provisions of the Data Privacy Act of 2012, its Implementing Rules and Regulations and other relevant issuances.

The data subject shall have the right, where personal information is processed by electronic means and in a structured and commonly used format, to obtain from the personal information controller a copy of data undergoing processing in an electronic or structured format, which is commonly used and allows for further use by the data subject. The Commission may specify the electronic format referred to above, as well as the technical standards, modalities and procedures for their transfer. The lawful heirs and assigns of the data subject may invoke the rights of the data subject for which he or she is an assignee.

Personal information that are excluded from the scope of the Data Privacy Act include those which are (1) processed or used only for the needs of scientific and statistical research and on the basis of which no activities are carried out or no decisions are taken regarding the data subject; (2) those which are gathered or processed for the purpose of investigations in relation to any criminal, administrative or tax liabilities of a data subject.

All employees, students and administration officers are enjoined to comply with and to share in the responsibility to secure and protect personal information collected and processed by **St. Edward School** in pursuit of legitimate purposes.

WHAT PERSONAL DATA WE COLLECT

St. Edward School collects the Personal Data of its students and family members, faculty and staff, including, but not limited to, personal information, basic contact details, assessment/ examination results, attendance, behavior, ethnicity, special education needs, and relevant medical information, government required document information.

HOW WE COLLECT PERSONAL DATA

St. Edward School collects data in the following manner:

1. In person from students, family and employees and job applicants.
2. From paper and electronic documents including but not limited to enrollment forms, emails, invoices, letters to the school, consent forms (e.g. field trips, medical form), job applications, the school websites (www.ses.edu.ph) and school sanctioned social media sites (e.g. Facebook, Instagram).
3. Through school-based software applications (e.g. ParentUpp, ERP System)
4. Student Services forms and documents.
5. CCTV camera footage located on school premises.

HOW WE USE PERSONAL DATA

As an educational institution, personal data collected by **St. Edward School** shall be used to:

1. Support the education of the students, including to monitor and report on their progress;
2. Provide appropriate personal and social care to students and teachers;
3. Assess its performance as a school, together with any other uses normally associated with this provision with an independent assessment centers or accreditation body;
4. For employment purposes such as but not limited to, determining eligibility for employment, administering compensation, professional development, performance evaluation, compliance for government related requirements, insurance claims, compiling directories, etc.;
5. Other legitimate and legal purposes as may be reasonably required by the school and government agencies.

HOW TO ACCESS AND CORRECT PERSONAL DATA

A registration form (AF-I.05) is accomplished by parents during the registration and enrolment period at the start of each school year. For the continuing students, changes and updates to the personal information are asked from the parents personally and are updated subsequently into the electronic system. If Personal Information needs to be accessed by the owner for review, verification or correction at a different time, parents may visit the school or may send a request through the following contact information:

For Students and Parents	: inquiry@ses.edu.ph
For Employees	: hr@ses.edu.ph

Requests for access to and / or correction of personal data may be subject to further verification by **St. Edward School** to ensure the authenticity of the same.

THIRD PARTIES, DISCLOSURE

The school will maintain the confidentiality and secrecy of all personal information that the school holds. Personal data, however may/will be disclosed by the school to its third party service providers whether local or foreign, pursuant to a lawful purpose, such as, but not limited to: (1) the provision of transport, medical, catering, travel, and online services; (2) fundraising, marketing, or promotional activities; and (3) provision of character references, educational history, and alumni services. Personal information may also be disclosed to local and national government agencies to satisfy reportorial requirements in line with their constitutionally or legislatively-mandated functions pursuant to existing laws, policies, ordinances, and procedures; education or labor laws applicable to **St. Edward School** students or employees, or to a lawful order of a court or tribunal.

DATA SECURITY AND STORAGE

To ensure that the rights of the data subjects are protected, (1) data subjects are notified and collection of their information is done with their consent which consent is included in the forms filled-out during application for admission, enrollment, availment of student services such as scholarships, access of school website, on the job trainings, application for employment, etc.; (2) only authorized personnel are allowed to access and process the personal information collected; and (3) only personal information which is reasonably or directly related to the School's primary or secondary functions or activities shall be collected.

The security of the data is important to **St. Edward School**, however, no method of transmission over the Internet, or method of electronic storage is 100% secure. While the school strive to use acceptable security measures as a means to protect Personal Data, the school cannot guarantee its absolute security.

St. Edward School has implemented various data protection measures to guard against unauthorized access and unnecessary retention of personal data in the system. Servers and hard copies of personal information are stored in secured areas and can only be accessed by authorized personnel.

Password protects user account, **St. Edward School** encourages to use a unique and strong password, limit access to computer and browser, and log out after having used the **St. Edward School** services.

RETENTION OF PERSONAL DATA

St. Edward School, in keeping with good practice of maintaining detailed and complete records may choose to keep personal data as long as necessary to the extent required by law, for the fulfillment of its legitimate purposes, for archival of records or general reference. In some cases, it may be used for legal purposes, such as for the establishment, exercise or defense of legal claims. When retention is no longer necessary for purposes of which it was collected, reasonable steps will be taken to de-identify or delete the personal data in a secure manner.

NOTICE OF CHANGES TO THIS PRIVACY POLICY

St. Edward School may update its Privacy Policy from time to time. This policy is posted on its website and update the “effectivity date” at the top of this Privacy Policy.

Anyone is advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on the website.

TRACKING COOKIES DATA

St. Edward School use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to the browser of the user from a website and stored on the device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

Browsers of the user can be instructed to refuse all cookies or to indicate when a cookie is being sent. However, if the user does not accept cookies, some portions of our Service may not be able to use.

LINKS TO OTHER SITES

The online services of the school may contain links to other sites that are not operated by us. If a third party link is clicked, the user will be directed to that third party’s site. **St. Edward School** strongly advises the users to review the Privacy Policy of every site visited. **St. Edward School** has no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CONTACT US

If you have any questions about this Privacy Policy, please contact the Data Protection Officer:

John T. Cabalo
inquiry@ses.edu.ph