

POLICY
Schoolwide
Series 4400
OTHERS

POLICY TITLE: DATA PRIVACY

POLICY NO.: 4430-12a

OVERVIEW

HKIS regards maintaining the privacy of personal data collected from an individual as a matter of utmost importance. HKIS has adopted and will continue to adopt policies and guidelines to ensure that all personal data of an individual is collected, used and handled at all times in accordance with the Personal Data (Privacy) Ordinance ("PDPO").

"Personal data" is defined as any data:

- relating directly or indirectly to a living individual (e.g. a student, employee, volunteer, prospective student, former student, parent, etc.),
- from which the identity of the individual to be directly or indirectly ascertained, and
- in a form in which access to or processing of the data is practicable.

In summary, an individual's personal data is anything that can identify that individual. Examples include the individual's name, his/her Hong Kong Identification Card number, a photo, or a passport. The individual who is the subject of the personal data is called the "Data Subject".

POLICY

This policy regulates the collection, use and handling of all personal data by Hong Kong International School ("HKIS") from students (current and former), the students' family members and donors.

- HKIS regards the privacy of personal data collected from a Data Subject as a matter of utmost importance.
- HKIS will collect, process, maintain and use personal data that is required in carrying on its business by means that are lawful and fair.
- HKIS will only use personal data collected for the original purpose for which the data was collected (or for a purpose directly related to that purpose) and will not use the personal data for other purposes unless with the prescribed consent of the Data Subject.
- HKIS will strive to ensure the accuracy of personal data collected and maintained by it and will retain personal data only for so long as it is required for the fulfillment of the purpose (including any directly related purpose) for which the data is to be used.
- All personal data will be stored securely and will be at all times accessible only by authorized personnel.

Personal Data Principles:

As an integral part of this policy, HKIS adopts the six data privacy principles laid down under the PDPO and strives to implement policies and guidelines in order to comply with those principles which are summarized as follows:

Principle 1 - Purpose and manner of collection of personal data

Personal data shall only be collected for a lawful purpose directly related to HKIS' business functions and activities, and the collection of data shall be adequate but not excessive.

- Personal data shall be collected by means that are lawful and fair in the circumstances of the case.

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- On or before the time of collecting the personal data, all practicable steps shall be taken to ensure that the individual is aware of whether it is obligatory or voluntary for him/her to supply the data, and the consequences for him/her of a failure to supply the data.
- On or before the time of collecting the personal data, the individual shall be informed of the purpose for which the data is to be used and the classes of persons to whom the data may be transferred.
- On or before the time of collecting the personal data, the individual shall be informed of his/her rights to request access to, and correction of the data collected from him/her, and the manner in which this request should be made.

Principle 2 – Accuracy and duration of retention of personal data

All practicable steps shall be taken to ensure that personal data collected by HKIS is accurate. Where there are reasonable grounds for believing that the data is inaccurate, the data shall not be used, or otherwise disclosed to any third party.

Personal data shall not be kept longer than is necessary for the fulfilment of the purpose(s) (including any directly related purpose) for which the data is collected and used.

Principle 3 – Use of personal data

Personal data shall not, without the consent of the individual, be used for any purpose other than the purpose for which it was collected or a directly related purpose.

Principle 4 – Security of personal data

All practicable steps shall be taken to ensure that personal data held by HKIS are protected against unauthorized or accidental access, processing, erasure or other use having particular regard to:

- the kind of data and the harm that could result if any of those things should occur,
- the physical location where the data is stored,
- any security measures incorporated, whether by automated means or otherwise, into any equipment in which the data is stored,
- any measures taken for ensuring the integrity, prudence and competence of persons having access to the data, and
- any measures taken for ensuring the secure transmission of the data.

HKIS will take all reasonable steps to ensure that personal data retained by HKIS is managed securely at all times and cannot be disclosed to or intercepted by any unauthorized party. All personal data should be handled and disposed of in a secure manner by authorized personnel only.

Principle 5 – Information to be generally available

All practicable steps shall be taken to ensure that a person will be able to:

- ascertain HKIS' policies in relation to personal data,
- be informed of the kind of personal data held by HKIS,
- be informed of the main purposes for which the personal data held by HKIS are or are to be used.

Principle 6 – Access to personal data

- An individual shall be entitled to ascertain whether HKIS holds his/her personal data.

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- An individual shall be entitled to request access to and correction of his/her personal data in accordance with the PDPO and other applicable laws and regulations.

Personal Information Collection Statement: Advancement Office

The purpose for which we collect, use and maintain data

1. for a student – data, including photos, may be used for marketing purposes, contact due to emergencies, and providing any information requested or required by any government authority or other authority whether in Hong Kong or overseas. HKIS may also use a Data Subject's personal data in providing School updates, promotion of the School, communications (photos in weekly newsletters) and maintaining contact for updates on academic, social, or school-related fundraising opportunities. Also, to inform contacts of upcoming school wide events and opportunities keeping them connected to our community of learners. Individuals may opt-out of these communications by contacting the HKIS Advancement Office.
2. for a former student – to inform them of appropriate events, alumni news, or opportunities that will enrich their continued learning as well as provide opportunities for them to network socially and professionally or provide support for the school.
3. for a student's family members – to maintain contact with parent / guardian for updates on upcoming schoolwide events and opportunities provided by HKIS and our affiliated organizations (e.g. Booster Club, Parent Faculty Organization) as well as opportunities to support the school.
4. for donors - for HKIS to build and steward relationships and celebrate accomplishments.

Consent to Receive Communications, Direct Marketing, and Promotional Materials

HKIS administration, the Parent Faculty Organization, or other school related committees and organizations may use the parents' or guardians' personal data (such as name and contact details) to send information related to programs, courses, school news, seminars, lectures, events, activities, and general community announcements including products or services provided or organized by HKIS or the PFO, the Booster Club, or otherwise approved third party providers or community volunteer organization about:

- I. shows, concerts, events;
- II. admissions events and Open Houses;
- III. campus services;
- IV. sports and community events;
- V. donations to support programs; and
- VI. educational services

that are relevant to the parent and guardian community and are not considered part of the academic program.

This may include (but is not limited to) information relating to extra-curricular activities, school shows/concerts/fairs, parent informational and fundraising events (e.g. Pumpkin Fest, Dragon Shop sales, etc.), the Annual Fund, and school newsletters.

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HKIS is required by law to give you the option to not receive this information. Parents and guardians will have the opportunity to consent to receiving this information when completing the registration forms in PowerSchool that are required for each child at the beginning of the school year.

Consent may be withdrawn at any time by writing to the HKIS Advancement Office at advancement@HKIS.edu.hk.

Please note that by opting out of receiving this information, you or your son or daughter may miss important information related to school activities that may affect his or her participation in the school community.

Disclosure and transfer of personal data

We may disclose the data when required by law or court order, or as requested by any government or law enforcement authorities, or in the good faith that disclosure is otherwise necessary or advisable including and without limitation to protect our rights or properties or in circumstances which we consider to be related to any of the purposes for which the data are collected.

Other than the parties listed above, the information collected will not be disclosed by us to any other party without prior consent.

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Data Retention

Students

We retain personal data of students from the date the student leaves HKIS.

Student Applicants

We retain the personal data of unsuccessful student applicants for a period of three (3) years. Thereafter, the application, together with all materials provided, will be confidentially disposed of, unless the applicant has enrolled at HKIS, in which case such data will have been transferred to the student's file.

In order to ensure the correct use and to maintain the accuracy of Data collected from the student, as well as preventing unauthorized or accidental access, processing, erasure or other use of the personal data, we have implemented various physical, electronic and managerial measures to safeguard and secure the personal data we collect.

PROCEDURES

How to access or correct your data

You are entitled to access or correct any personal data relating to you held by us, in accordance with the PDPO. If you wish to obtain a copy of any of your personal data or if you believe that the personal data relating to you which we collect and maintain is inaccurate, you may make the relevant data access request in accordance with the PDPO. The request should be sent to:

*Head of School
Hong Kong International
School 1 Red Hill Road
Tai Tam
Hong Kong*

In accordance with the terms of the PDPO, we have the right to charge a reasonable fee for the processing of any data access request.

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| Date Adopted | : | March 2007 |
| Date of Last Review | : | April 2020 |