

PRIVACY POLICY

If your children attend our school - Villa Luna mateřská škola s.r.o., you are giving us, as personal data controllers, the personal data of your children, to enable us to properly provide them with education under applicable legislation, and also to carry out other activities that are connected with upbringing and educating children.

In this Privacy Policy, you will find out which personal data we collect, why we collect them, and what we do with them. The following information is important, so we hope you will find the time and read it carefully. If there is anything incomprehensible, or you would like to get more information, you may visit us in the office of our school or contact us via e-mail at info@villaluna.cz.

Furthermore, we would like to inform you that a Data Protection Officer has been appointed for the area of personal data protection at our school. The data protection officer is a professionally knowledgeable person in the area of personal data protection, who, for example, has the task of supervising the proper handling of personal data, of consulting the data controller on how best to follow the proper principles of data protection and, last but not least, you may also contact him with your questions or requests. The data protection officer for our school is JUDr. Ing. et Ing. Roman Ondrýsek, Ph.D., MBA., registered at Palackého 150/8, 796 01 Prostějov and can be contacted by phone at: 732 464 854, 732 657 386, 733 281 378, email: poverenec@gdprdoskol.cz

This Privacy Policy explains:

- What information (personal data) we collect, for what reason and on what legal grounds
- How we use this information
- How long we handle this information
- Who may view the personal data (so-called recipients of personal data)
- What rights the children and their legal representatives have regarding the data controller

We strive to make this document clear and comprehensible. If, however, you do not fully understand some terms, as they are legal terms (such as personal data processors, pseudonymization etc.), do not hesitate to contact us or the data protection officer. We will be happy to explain the details.

Information we handle and their processing period:

Administrative Procedure

If you are registering to our school, you first fill out an application form for education, on the basis of which the children take part in the admission procedure. At the end, the school director makes a decision about (not)



accepting the child for education. The entire process is called administrative procedure, where the school director (as an administrative body) decides about the rights and obligations of a nominated person¹. In order to conduct such an administrative procedure, we need to know the following basic identification or descriptive personal data:

- Of the child (kindergarten): name and surname, date of birth, birth number if applicable, address of permanent residence or correspondence address, information about vaccinations (not obligatory)
 - We may ask for further information, such as information about previous education, state of health (e.g. allergies), special interests or problems, whether the child has a sibling, or whether there is interest in attending the school club² - necessary information about the state of health are included in a special category of data - so-called sensitive data
 - We also collect data about the health insurance company of the child
- Of the legal representative: name and surname, permanent address or correspondence address, data mailbox ID (if available), telephone number or e-mail

We process these personal data to fulfill a legal obligation, namely to conduct the administrative procedure (the decision on admission to (pre-school) education). The legal right for handling this information is in accordance with Article 6 section 1 c) GDPR³ fulfillment of a legal obligation, pursuant to provisions of § 34, § 34a, § 34b and/or § 36, § 46 of Act No.561/2004 Coll., the Education Act and Act no. 500/2004 Coll., The Administrative Code, as well as the implementing legislation on the above mentioned laws.

For the purpose of conducting the administrative procedure, we collect (archive) the personal data for the period specified in the school's record and shredding plan. In the case of applications for admission to pre-school education and the decision concerning this application is negative, the period is 5 years, in the case of a positive decision on this application, the period is 10 years.

Admission to education is not the only administrative procedure that can take place during the education of the children. Other procedures can be e.g. the termination procedure of the individual education of a child (§34b sec. 5 of the Education Act) etc. Within this activity, only data necessary for conducting such procedures are processed, i.e. the data listed above. For administrative decisions concerning the start/end of an individual education plan, the archiving period is 10 years.

¹ see § 9 of Act No.500/2004 Coll., Administrative Procedure Code.

² We collect these data only to the extent necessary for the legitimate interests of the school; for the sake of the highest quality of education, we need to know the history of the pupil's education, as well as other information that serve to fulfil his/her educational needs.

³ Regulation 2016/679 of the European Parliament and Council (EU) from 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and on repealing Directive 95/46/ES (the general regulation on the protection of personal data).



The Registry of Children, Pupils and Students and Other School Documentation

The School Act imposes the obligation on all schools to keep certain documentation on their activities. Mandatory documentation includes the keeping of so-called records of children, pupils or students pursuant to § 28 section 1 b) of the Education Act. This is the so-called school registry. Its requirements are laid down in § 28 section 2 of the Education Act. We therefore have to keep the following personal data in the school registry:

- Of the child, pupil or student: name and surname, birth number, date of birth, nationality, place of birth and address of permanent residence, or place of residence in the Czech Republic according to the type of foreign residence, or residence abroad if the child does not reside in the Czech Republic, commencement date of school attendance, data on the course and results of school education, educational language, data on a disability stated in §16 of the Education Act, data on extraordinary talents, data on provided support measures, conclusions of examinations stated in the recommendations of a school counseling facility, data on medical fitness for education and health problems that could affect the course of education, end date of school education
 - These are mainly basic identification or descriptive personal data, but to a certain extent, health information, which is considered a special category of personal data - so-called sensitive data, is also processed
- Of the legal representative: name and surname of the legal representative, place of permanent residence or domicile, if he/she does not have permanent residence in the Czech Republic and correspondence address, phone number
 - These are basic identification or descriptive personal data
- To be able to communicate effectively and quickly with the legal representatives, they may voluntarily give us their e-mail address. Such personal data are then processed on the basis of legitimate interest of the data controller pursuant to Article 6 section 1 f) GDPR.

We process these personal data in order to fulfill a legal obligation - to keep records of children, pupils or students - to keep the school registry. Therefore, personal data are processed in the school registry on the basis of fulfilling the legal obligation that arises for our school from the Education Act. Processing such data is therefore in accordance with Article 6 (1) c) GDPR. The school registry is kept for the period stipulated by the Archiving and Recording Act⁴ for a period of 50 years, unless it is an archival document, which is, pursuant to Section 16 of Annex No. 2 to the Archiving and Recording Act, always obligatorily submitted to the State Archives as a selection of archival records.

⁴ Act no.499/2004 Coll., on Archiving and Recording and on amendments to certain acts.

However, school registries are not the only document that the school is obligated to complete. Other mandatory documents where personal data of children, pupils or students appear, are e.g. a book of injuries and others. The purpose of processing personal data in such documents is to properly perform educational activity, and to fulfill legal obligations while providing education. The retention period of these documents is stated in the school's record and shredding regulations, and varies according to the type of document. Such processing is again carried out on the basis of legal obligations and, therefore, in accordance with Article 6 section 1 c) GDPR.

Meals

In order to properly provide the children and pupils with catering services, we also need to process information that is most often stated on the registration form for meals. These include the following personal information:

- Of children: name and surname, date of birth or birth number, nationality, permanent address or address of domicile (correspondence address), school year, class, date of commencement and termination of the catering services, details of health problems that could influence the services provided (e.g. a gluten allergy)
 - These are mainly basic identification or descriptive personal data, however, information about health difficulties is health information, which is considered a special category of personal data - so-called sensitive data
- Of legal representatives: name and surname, permanent address or address of domicile (correspondence address), telephone or email, bank account number

Catering services are provided on the basis of a meal registration form. The registration form thus establishes a certain (legal) relationship, where the catering service provider is obliged to provide the service and on the other hand, the service recipient has other obligations, typically the obligation to pay for such a service. The registration form for catering could be considered a contract. In such a case, the processing of the above mentioned personal data for the reason of providing catering services occurs on the basis of fulfilling the contractual relationship under Article 6 section 1 b) GDPR.

Presentation of the School and Security

For the purpose of presenting the school, we use the website www.villaluna.cz and www.expats.cz, our Facebook page (<https://www.facebook.com/VillaLunaPraha/>), or we publish some important news in common media (such as the local press or regional TV). It may happen, that in order to inform the public about events at our school and for presenting the school, we will publish the name and surname of a child, pupil or student and, as the case may be, a photograph, an audio or video recording, or artwork. However, you do not have to worry, we require a consent to the processing of your personal information for such publishing.



We would like to point out, that for some publishing of photos or video recordings, a consent to processing personal data is not needed. This is the case when a particular person is not completely identifiable on a given photo or video. However, if you still request that such a photo or video not be published, we understand this and you may contact the school or data protection officer with a request of erasure.

Economic Activity and Accounting

The main activity of our school is to provide education. In order to be able to carry out our main activity properly and dutifully, we need to ensure the day-to-day operation of the school - e.g. accounting, operation of telephones, IT networks, or even regular maintenance of the building. To this end, we sign various private-law contracts with service providers. Also in these contracts, personal data of the contractual partners appear.

- Most frequently they are the following personal data: name and surname, business ID, business address or registered address, permanent address or address of domicile (correspondence address), tax identification number, e-mail and telephone.

We process these personal data primarily for the purpose of fulfilling a contract, i.e. under Article 6 section 1 b) GDPR, but also for fulfilling contractual obligations, i.e. under Article 6 section 1 c) GDPR. The fulfillment of contractual obligations occurs typically when, on the basis of a sealed contract, we have to record an invoice or other tax document in the accounting pursuant to Act No. 563/1991 Coll., on Accounting. Contracts are kept for a maximum of 10 years, as they can be subject to a review by the founder for a period of 5 years.

Information About the Rights of Data Subjects

Every data subject has the following rights:

- To request a limitation of the processing of personal data
- To request clarification regarding the processing of personal data
- To request information about which personal data are processed based on the consent
- To cancel a consent to processing at any time
- To request access to processed data, and to update, rectify or add data
- To request erasure of personal data
- In case of doubt about the compliance with the personal data processing regulations, to contact the data controller or the Office for Personal Data Protection (www.uoou.cz)



Recipients of Personal Data

We are very careful with the confidential personal data entrusted to us. Most of all, this includes making sure only persons who are entitled to handle such data should have access to them. It can happen, in the course of our operation, that another person has access to the personal data. This is typically the case for public authorities exercising control, the founder authorities of the school, or persons providing services or other activities for the school (e.g. the organizer of school competitions, the organizer of an event such as an excursion or an overnight trip). The recipients of personal data receive only that personal data, which they absolutely need for providing and performing their activities for the school.

Security of Personal Data

We know that protecting the privacy of children, pupils and students, as well as other categories of personal data subjects, is an important part of our activity and we do not underestimate it. That is why we always strive to take adequate measures to ensure that the information we process is suitably confidential. We therefore, for example, use the following security features to ensure that we respect the privacy of personal data:

- The school employees are bound by confidentiality about the facts they learn during the course of their work.
- Personal data are stored in lockable areas, where only a limited number of school employees have access.
- In the case of personal data storage in the digital environment, computing mediums are adequately secured both physically (against theft or destruction) and internally (against harmful software, setting up electronic security access only to authorized persons, and last but not least, using secure communication channels that use encryption elements).
- If we pass personal data over to some recipients (see above), we always ensure:
 - That they are persons who are entitled to handle the data
 - That they do not receive personal data they do not necessarily need to perform their activities
 - That such persons are handling the personal data with sufficient care and caution
 - That the recipient will keep the same confidentiality that the school employees are bound to
- When publishing results from the registration procedure, we use so-called pseudonymization, where the results of the children are not published under their own name but under a particular identifier (e.g. the registration application number).
- Only employees who are authorized to handle personal data have access to such data within the organization.



- Data security is continuously reviewed and updated with regard to the way personal data is handled.

Conclusion

In our school, we try to process only personal data we absolutely need for the performance of our committed activity, i.e. the provision of education. In most cases, we handle the information because we must fulfill a certain legal obligation - in this area, education regulations are fundamental. Other legal reasons for handling personal data are processing data necessary for fulfilling the contract or for legitimate interests of the data controller. However, we process only a small amount of such personal data.

In exceptional cases, we may have to obtain a consent to processing for certain processing or for certain personal data. You have the right to e.g. withdraw such a consent.

In any case, we process personal data only for the necessary time, which is most often stated by a certain law (typically the Archiving and Recording Act, the Accounting Act etc.), or the period results from a declared purpose for which the data are processed.

We take the privacy of all data subjects seriously. That is why we make sure that all information is stored in a safe place and that only people who are entitled to handle the information have access to it. When we pass personal data on to recipients, it is only for the activities of public authorities (especially performing checks and inspections), or for entities providing education-related services or activities. However, we always make sure that such sharing of information is only for a limited time period, that the recipient complies with the same standards of personal data protection as the school, and, last but not least, that the recipient deals only with the personal data they necessarily need.

Handling information with transparency is important in this area, so if you have any questions, feel free to write us on info@villaluna.cz or use the contacts listed above.

