



King's Group

**SCHOOL DATA PROTECTION POLICY
(INFORMATION FOR PARENTS & STUDENTS)
KING'S COLLEGE, THE BRITISH SCHOOL OF
PANAMA**

DOCUMENT VERSION

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1. PURPOSE

KING’S COLLEGE, THE BRITISH SCHOOL OF PANAMA (also referred throughout this document as “*the School*”) has as one of the main values the privacy and confidentiality of all people, especially those whose personal data we process. Within that commitment, the protection of our students’ personal data is essential.

In accordance with the provisions above, the purpose of this policy is to give you information about what, how and why we collect your personal information, how we may use that information and with whom we may share it and why. Our Privacy Policy also describes the measures we take to protect the security of your information. We also tell you how you can contact us to get answers to questions you may have about our privacy practices and how you can exercise your rights over your personal data.

The School is strongly committed to compliance with the Law No. 81 of March 26th, 2019 on Protection of Personal Data, as well as the rest of the applicable legislative bodies in matters of child protection and education among others.

It goes without saying that the School is committed to the protection of minors, and watches at all



times for the safeguarding of their interests.

The School must comply with privacy legislation and this policy. This policy will be regularly reviewed and updated to take account of new laws in force, new technologies and the changing of the School environment when required. Please ensure you have read the current version of this policy.

2. SCOPE

This policy is intended to provide information to parents/guardians and students as well as board members, employees, interns, volunteers, contractors and people visiting the School's site.

It describes the type of information that the School collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

The School is the Data Controller as it processes personal data about current, past and prospective students and their parents, legal representatives or guardians (referred to in this policy as "*parents*") as well as the subjects mentioned above and third parties who, with their consent, communicate their personal information.

The School staff, parents and students are all encouraged to read this data protection policy and understand the School's obligations to its entire community.

This data protection policy also applies in addition to the School's other relevant terms and conditions and internal and external policies, including any contract between the School, staff, parents of students (and students themselves over age of legal competence), safeguarding and internal policies like retention of records policy, the School's policy on the use of cameras and images at the School, social media policy, safeguarding policy, exams policy, data protection policy for employees, policy on the use of CCTV or biometric data, policies of confidentiality and privacy, information security policy, ICT policies and health and safety policy, among others, including how concerns or incidents are recorded.

3. TERMS & DEFINITIONS

1. **Personal Data:** any information related to an individual or '*Data Subject*', that can be used to directly or indirectly identify the person. This can be anything from a name or address to a photograph, voice or banking details and includes one or more factors related to someone's health and economic, cultural or social identity.

2. **Minor:** a data subject under the age of full legal responsibility related to data protection and especially the legal age to consent. Under the Civil Code of Panama, the legal age to consent is 18 years old.

3. **Data Subject:** is any physical individual whose personal data is being collected, held or processed.

4. **Data Controller:** any organization, person, or body that determines the purposes and means of processing personal data, controls the data and is responsible for it, alone or jointly.

5. **Data Processor:** a data processor processes the data on behalf of the data controller. Examples include catering services, school transport, psychological services, extracurricular classes, etc.



6. **Consent:** is any “*freely given, specific, informed and unambiguous*” indication of the individual’s wishes by which the data subject, either by a statement or by a clear affirmative action, confirms agreement to the processing of personal data by the data controller for one or more specific purposes.
7. **Data processing:** is any operation performed on personal data, such as collection, storage, transfer, modification, deletion, etc., whether or not by automated means.
8. **Personal information:** is any information related to an identified or identifiable natural person and that is recorded in any form. For example, a person’s name, address, phone number and age. Pseudonymised information (see definition below) about students can also be personal information
9. **Biometric Data:** personal data that results from specific data processing related to physical and behavioural features of a person, which allows the identification of that person (e.g., fingerprints).
10. **Genetic data:** data related to a natural person's genetic characteristics, whether inherent or acquired, which offers information about the mental or physical health of that person.
11. **Data concerning health:** personal data referring to the personal mental and physical health of a person, including information on health services accessed.
12. **Sensitive personal data:** data relating to religious or other beliefs, sexual orientation, health, race, ethnicity, political views, trade union membership, criminal record, etc.
13. **Data Protection Officer (DPO):** is a role required by Law No. 81 with formal responsibility for overseeing a company's data protection strategy and its implementation to ensure compliance with Law No. 81 requirements.
14. **Data Protection Authority (DPA):** it is a national authority responsible for the supervision of the implementation and protection of data and privacy as well as implementing and enforcing data protection Law. In Panama the authority is Panama’s National Authority of Transparency and Access to Information (“*ANTA*”) which will be supported by the National Authority for Government Innovation (<https://www.antai.gob.pa/>).
15. **Pseudonymisation:** the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
16. **Profiling:** any automated processing that uses personal data to evaluate certain personal aspects and predicts future actions and aspects relating to an individual, or to analyse or predict in particular that person’s performance at work, economic situation, location, health, personal preferences, reliability, or behaviour.
17. **Representative:** a natural or legal person appointed by the data processor or controller to represent him with respect to the obligations under the regulation. It can also refer to a person which acts on behalf of the data subject, e.g., legal tutor of a minor.
18. **Third party:** is any natural or legal person, public authority, agency, or any other body other than the data subject, the controller, the processor, and the persons who, under the direct authority of the controller or the processor, are authorised to process data.
19. **Legitimate interests:** are referred to the rights and freedoms of those individuals which could be affected by the data processing carried out by a company or organisation. The purposes of the data processing must be based on legal ground.



20. **Rights of the data subjects:** Data subject rights is regulated in article 15 of Law No. 81 of March 26th, 2019 on Protection of Personal Data and it includes the rights to access, object, portability, rectification and erasure (or cancellation).

21. **Parental responsibility:** means the legal rights, duties, powers, responsibilities and authority a parent has for a child and the child's education. A person who has parental responsibility for a child has the right to be informed and make decisions about their academic information, care and upbringing. Important decisions in a child's life must be agreed with anyone else who has parental responsibility.

4. DATA PROTECTION PRINCIPLES

4.1. The Law No. 81 establishes eight enforceable principles that must be adhered to at all times:

- **Loyalty:** Personal data is collected without deception or falsehood and without using fraudulent means
- **Purpose:** Personal data must be collected for specific purposes and not subsequently processed for purposes other than those for which they were requested, not kept for longer than necessary for the purposes of the treatment.
- **Proportionality:** Only adequate, pertinent and limited data is requested in relation to the required purpose.
- **Truthfulness and accuracy:** They must be exact and respond truthfully to the current situation of the owner of the data.
- **Data security:** Those responsible for the processing of personal data must adopt measures to guarantee the security of the data and inform the owner, as soon as possible, when the data has been stolen without authorization or there are indications that its security has been violated.
- **Transparency:** Information and communication must be expressed in clear and simple language.
- **Confidentiality:** All persons involved in the processing of personal data have the obligation to keep secrecy or confidentiality regarding them.
- **Legality:** The data must be collected in a lawful manner, with the prior, informed and unequivocal consent of the owner or on legal grounds.
- **Portability:** The owner of the data has the right to obtain from the person in charge a copy of the personal data in a generic and commonly used format.

Requirements for consent to collection, use or disclosure of personal information may vary depending on the circumstance and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, what form of consent is appropriate, the School will take into account both the sensitivity of the personal information and the purposes for which the School will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate), or deemed. For example, if an individual provides to the School his/her mailing address and requests information regarding a particular service, consent to use the address to provide the requested information may be implied. On giving reasonable written notice to the School, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon notice of withdrawal of consent,



the School will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, the School will stop collecting, using or disclosing the personal information as requested. If a person provides the School or its service providers or agents with personal information about an individual, the person represents that it has all necessary authority and/or has obtained all necessary consents from such individual to enable the School to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

4.2. Personal data shall be kept secured and protected by the technical and organisational measures which ensure an appropriate degree of security, integrity, confidentiality and privacy;

4.3. Personal data shall not be transferred to a country or territory outside Panama, unless that country or territory ensures an adequate level of data protection.

4.4. The School shall sign a data sharing agreement when we are sharing personal or other sensitive data with other parties involved in any data sharing activities.

5. WHAT INFORMATION DO WE COLLECT?

The School collects the following type of information:

1. Information about students, their parents or tutors and their representatives, provided directly by them or their authorised persons;
2. Information about job applicants, staff members, interns, volunteers, visitors, contractors, customers, advisors as well as those of its affiliates and third party agents engaged in supporting the School business, provided directly by them or their representatives;
3. Information about third parties or potential students or clients interested in the School services and who provided their consent to the processing of their data for the purposes set forth in this policy.

6. HOW DO WE COLLECT YOUR PERSONAL DATA

- a. Personally and over the phone: from students and their family, staff, visitors, contractors, job applicants, legal representatives and others;
- b. From electronic and paper documentation: including job applications, emails, invoices, enrolment forms, letters to the School, medical forms, consent forms (for example: enrolment, extracurricular activities, etc), our school's websites or the School controlled social media;
- c. Online tools: such as apps and other software used by the School;
- d. Photographs or other audio-visual contents for educational or commercial purposes with due information and consent of the data subject;
- e. CCTV cameras located at our schools;
- f. Geolocation integrated systems in means of transport (if applicable in each school);

7. YOUR RIGHTS IN DATA PROTECTION



- Rights (stipulated in articles 21 to 31 Law No. 81) (“ARCO” Rights):
 - **Access:** Individuals have the right to access their personal data, this is commonly referred to as “*subject access request*”. It can be made verbally or in writing and it is free of charge.
 - **Rectification:** individuals have the right to correct inaccurate personal data or to have it rectified; or completed if it is incomplete.
 - **Cancellation (erasure ‘right to be forgotten’):** deletion of personal data.
 - **Object:** This right gives individuals the right to object to the processing of their personal data in certain circumstances. Individuals have an absolute right to stop their data being used for direct marketing. In other cases where the right to object is applicable, the school may be able to continue processing if there is a compelling reason for doing so.

You can exercise your rights by sending a written request and a copy of your passport or ID number in order we can identify you to: dpo@kingsgroup.org.

The School will reply to your request without undue delay in the term of 10 days calendar from the receipt of your request according to the legal terms.

8. LAWFUL BASIS AND PURPOSES TO PROCESS YOUR DATA

8.1 According to Art.6 of Law, the lawful basis to process data must be supported when:

1. Informed consent of the data owner is obtained; or / and
2. The processing of the data is necessary for the execution of a contractual obligation, provided that the owner of the data is a party.
3. The processing is necessary for the fulfilment of a legal obligation for which the person responsible for the data is subject.
4. The processing of personal data is authorized by a special law or the regulations that develop them.

8.2. Consent is the main basis for processing personal data and it must be freely given, specific, informed, unambiguous and granted under solid information that the School guarantees at all times. Your consent is our legitimation for the data processing.

In order to carry out ordinary duties to staff, students and parents, the School may process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation. Some of this activity needs to be carried out in order to fulfil their rights, duties or obligations, including those developed under a contract with their staff, parents or students themselves if they are emancipated.

Other uses of personal data will be made in accordance with the School’s legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals,



and provided it does not involve special or sensitive types of data. The School expects that the following uses may fall within that category of “*legitimate interests*”:

1. For the purposes of attending individuals’ queries;
2. For student selection (and to confirm the identity of prospective students and their parents);
3. To provide education services, physical training or spiritual development, career services, extra-curricular activities and monitoring students’ progress and educational needs;
4. To provide school transport services, catering, specialised care, etc;
5. Maintaining relationships with *Alumnae* and the School community, including direct marketing or fundraising activity;
6. For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
7. For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
8. To enable relevant authorities to monitor the School’s performance and to intervene or assist with incidents as appropriate;
9. To give and receive information and references about past, current and prospective students, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past students;
10. To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School;
11. To safeguard students’ welfare and provide appropriate pastoral care;
12. To fulfil the School’s contractual and legal obligations;
13. To monitor (as appropriate) use of the School’s ICT and communications systems
14. To make use of photographic images of students in the School’s publications on the School’s website and (where appropriate) on the School’s social media channels;
15. For security purposes, including CCTV;
16. Besides the aforementioned uses, regarding the School’s staff for the selection and recruitment, processes, professional background, assessment of suitability and qualification for the position, criminal records, hiring, payroll, entries and removals in the personnel registers, etc.;

And

17. Where otherwise reasonably necessary for the School’s purposes, including to obtain appropriate professional advice and insurance for the School.

8.3 In addition, the School may need to process a special category of personal data (concerning health or religion) or criminal record information in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

- To safeguard students’ welfare and provide appropriate pastoral (and where necessary, medical) care and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual’s medical condition where



it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of School trips;

- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example Disclosure and Barring Service (DBS) checks, welfare or pension plans;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with the legal obligations and duties of care.

9. TYPES OF PERSONAL DATA PROCESSED

This will include by way of example:

1. names, addresses, telephone numbers, e-mail addresses and other contact details;
2. car details (for those who use our car parking facilities);
3. ID numbers, passports, insurance, background checks;
4. bank details and other financial information, e.g. about parents who pay fees to the School;
5. past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), employment information and examination scripts and marks;
6. past, present and prospective parents' employment information, family status, documents issued by a Court or by a public authority, powers of attorney, etc;
7. where appropriate, information about individuals' health, and contact details for their next of kin;
8. references given or received by the School about students, and information provided by previous educational establishments and/or other professionals or organisations working with students;
9. images of students (and occasionally other individuals) engaging in the School activities, and images captured by the School 's CCTV system (in accordance with the School's policy on Taking, Storing and Using Images of Students);
10. in case the School is using an application for children's location in the bus transport service, parents or legally authorised persons can also accede to follow up such location when the application or similar is used for the correct execution of such service.
11. information relating to past, present and prospective School personnel.

The School also processes data from its staff, suppliers, interns, volunteers, officers, agents, contractors, advisors as well as those of its affiliates and third party agents engaged in supporting the School.

The purposes for which the School use personal information of the aforementioned data subjects may include, among others:

- Administering the individual's employment or contract, as the case may be.
- For insurance purposes.
- Marketing purposes.



- To satisfy the School's legal obligations, specially related to child protection legislation.

10. TRANSFER OF INFORMATION BETWEEN OUR SCHOOLS

When a student has been accepted at, and is enrolling to another school, the School transfers information about the student to that new school. This may include copies of the student's school records and health information.

This enables the new school to continue to provide the services for the education of the student, to support the student's social and emotional wellbeing and health and to fulfil legal requirements among other obligations.

As the School is integrated into the INSPIRED international network of schools, it is possible for the student to study at any of the group's schools, so data communication between the centers will be necessary, including international data transfer if appropriate, within the legal conditions.

The transfer of personal data that receives cross-border processing will be allowed as long as the person responsible for it! storage of those data or the custody thereof complies with the personal data protection standards required by this Law, or can demonstrate that it complies with the standards and regulations for the protection of personal data equal to or superior to those required by this Law. College will carry out international data transfers in our case when:

1. The owner has given consent for the transfer.
2. The transfer is necessary for the celebration or execution of a contract entered into or to be entered into by the interested party or in his interest.

The school will take appropriate safeguarding measures to carry out such a transfer.

11. STORING AND SECURING INFORMATION

The School shall use the appropriate technical and organisational measures to ensure the security, confidentiality, integrity and privacy of the personal data, preventing from unauthorised access or unlawful processing against accidental loss, destruction or damage of the files.

12. UPDATING YOUR INFORMATION

The School endeavours to ensure that the information that we process is always accurate, complete and up to date. To update your information, please contact the corresponding the School's Human Resources department, Finance department, Admissions and Administration departments.

13. SHARING YOUR INFORMATION



The School will only share your information with third parties on a *need-to-know basis* and with your consent except in cases relating to legal requirements, safeguarding of children, criminal activity, or if required by legally authorised bodies (e.g., Courts, police, social services, etc). If we decide to share information without parental consent and strictly under the cases stipulated by Law, we will record this in the student's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the students in our care.

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the daily operation of our business, for example to run our payroll and accounts, legal advisors, etc. Any such third parties comply with the Law No. 81 and the applicable data protection regulations.

14. PARENTAL RESPONSIBILITY

In cases of shared parental rights, regardless of who has legal custody, both parents have the right to receive the same information about the circumstances that occur in their child's educational process, which obliges the School to guarantee the duplication of the information unless a judicial resolution is provided that establishes the deprivation of parental rights to any of the parents to some type of criminal measure prohibiting communication with the minor and / or his/her family. All conflicts that could arise between parents in this regard must be brought before a family and juvenile court.

Parents will have the right to access to the academic and educational information of their children, even if they are of legal age or emancipated, as long as they incur alimony or education or food expenses, in which case the legitimate right of information of the parents will prevail on the privacy rights of the student of legal age or emancipated.

15. SENDING COMMERCIAL COMMUNICATIONS

The School may send you information or materials such as prospectuses, leaflets, newsletters, etc by e-mail or postal mail under your consent when you submit your postal or email address via Website. By ticking the box in the corresponding consent form, you are authorising to the School the sending of such commercial information or materials.

You can also authorise or unauthorise the communication of your data for the same purposes among other Inspired schools.

You can withdraw your consent at any time, so if you do not want to receive promotional information, please send an email with your name, and surname, a copy of your ID number, your mailing address and your request to dpo@kingsgroup.org. As soon as we receive it, we will take reasonable steps to remove your name from such lists.



16. CONSENT TO USE YOUR IMAGE

The School emphasises the importance of celebrating pupil success and as such photos and videos of our pupils are often used to showcase their skills and talents, as well as the day-to-day life of the school.

The School is committed to the protection of the image of our students and we take compliance with data protection regulations very seriously, especially regarding consent to the publication of audio-visual contents and the protection of confidentiality and privacy of our students, staff and other people who may appear in our publications.

At the beginning of the school year, the School requests authorisation to share the students' audio visual contents on the School websites, marketing, social media channels, press and extracurricular activities. Students of legal age can give their consent by themselves without parental authorisation without prejudice to parental supervision.

The School will never disseminate any photograph or video without the parents or data subject's previous consent.

The School has an official photographer who attends special events at the school and who is also compliant with the Law No. 81 requirement.

On the other hand, although it is allowed for parents to take pictures of their children in special and organised events and celebrations within the schools facilities, the School is not responsible for the use that parents make of the images nor for claims of third parties that may appear in the photographs of the parents without their consent.

In addition, the School does not authorise the use of the contents of its publications by third parties nor is reliable for the responsibilities that may arise for these third parties from these unauthorised uses.

In cases in which the student's image will be used for specific advertising purposes, the School, through the central marketing services, will send parents the corresponding information about the use of the images and its duration as well as a sample of the photographs to be used, ensuring your consent. Similarly, your consent will be collected annually for the taking and use of your child's image for the school yearbook.

In relation to the activities carried out outside the school, the consent of parents or students with legal age is required when these activities are not carried out in the exercise of the educational function. When the recording or taking of photos is done by third parties, that is, by those responsible for the activity or institution that is visited by the students, it will be the obligation of these third parties to obtain the consent through the school.

Finally, in order to preserve the safety and privacy of students and parents in the School's facilities, it is strictly forbidden to record videos or take photographs within the facilities except in specific organised events or circumstances in which it is permitted and with the limitations set forth above.



17. PERIOD OF RETENTION

Personal information will only be retained for the period of time required to fulfil the purpose for which it was collected. Once the personal information is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

18. DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the School at least on an annual basis of any changes to information held about them. Responsibility for changes in information relating to students rests with the parents.

The data subject has the right to request that any inaccurate or out-of-date information about them is erased or corrected.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to the School's systems. The School personnel will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

19. COOKIES

The School website tracks web browsing patterns to better understand how our website is being used. This generic information is collected through the use of session cookies. The cookies used by our websites are associated with an anonymous user and their computer, and they are not related to the user's personal data.

The cookies used in our websites are all temporary, with the sole purpose of making future transmission more efficient. In no case will the cookies be used in order to collect personal data.

IP ADDRESSES

The website servers will automatically be able to detect the IP Address and domain name used by the user. All of this information is collected in a file about server activity that allows subsequent processing of data with the aim to collect statistical measurements only, which show the number of printed pages, the number of visits to web services, the reasons of the visit, the point of access, etc.

SECURITY

The website uses information security technologies which are accepted throughout the industry, such as *Firewalls*, methods to control access and cryptic mechanisms. All of these have the objective of preventing unauthorised access to the data. In order to carry out these purposes, the user/ client accepts that the provider collects data for purposes of authentication for access control.



20. EDUCATIONAL APPLICATIONS

The School uses a school management information system (MIS) as well as different educational and learning platforms to complement teaching (cloud computing services). These platforms store and process sensitive data of parents, teachers and students strictly for internal and educational purposes.. The teachers request, prior to their use, authorisation from the School. Each authorisation request involves the assessment of the application from the point of view of data protection and information security as well as the subsequent authorisation or denial by the School.

All users of these platforms have restricted access through convenient passwords. The use of such educational platforms does not imply at any moment the transmission of student data to the application's service provider so that they can use such data for their own purposes or store the data permanently. The school will always retain its right to access to student's data and its deletion when deemed appropriate.

These platforms are in strict compliance with the data protection legislation and assure the adoption of sufficient guarantees in case there is an international data transfer.

The use of such educational platforms does not imply at any time the transmission of student data to the application's service provider so that they can use it for their own purposes or store the data permanently. The school will always retain its right of access to data and its deletion when deemed appropriate.

This data protection policy is reviewed periodically to ensure compliance with Data Protection current regulations.

Last update 18th June, 2024

For further Information:

Dpo's contact details: dpo@kingsgroup.org and <https://www.panama.kingscollegeschools.org/privacy-policy>