



CONFIDENTIALITY POLICY

In accordance with the provisions of Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data, we inform you in this privacy policy how the processing of your personal data by the Lycée Français Anna de Noailles takes place and how we ensure that your personal data is processed responsibly and in accordance with applicable data protection legislation.

In order to achieve the purposes set out in this privacy policy, the Lycée Français Anna de Noailles is the data controller, and you will find more information about who we are and how to contact us below:

- FUNDATIA LYCEE FRANCAIS ANNA DE NOAILLES, with registered office in Sos. Bucuresti-Ploiesti nr 160A, sector 1, Bucharest ;

- Unique registration code 18153988
- E-mail: <u>dpo@lyceefrancais.ro</u>

-What kind of data do we process and what is its source?

Student data

The personal data we process for the purposes of organising courses, including course-related services, includes, by way of example, the following categories of data

a. Personal data such as surname, first name, date of birth, identity card or passport number and series;

b. Contact details, such as: home/residential/postal address; mobile/fixed telephone number; fax number; e-mail address;

c. Financial data, such as payment for services;

d. Location data applicable to students enrolled in the Pronote programme;

e. Health data, medical records, health problems justifying absence from classes and allergy information for safety reasons.

Data on parents

a. Personal data, such as: surname, first name, date of birth, series and number of identity card or passport;

b. Contact details, such as: home/residence/postal address; mobile/fixed telephone number; fax number; e-mail address;

a. Financial data, such as payment for services;

You are not obliged to provide the personal data listed above, however, please bear in mind that without this data it may not be possible to provide you with the requested services or to maintain the collaboration.

We collect most of the information when you request services provided by the Lycée Français Anna de Noailles, on our website or on our partners' websites, as well as when you have been contacted by one of our representatives..





Why do we process your data?

We will process the above personal data on the basis of the financial agreement with the parents/legal guardians of Lycée Français Anna de Noailles students. If you have requested further information about the courses offered by the Lycée, we will process your data for the purpose of informing you about the educational and financial offer, useful information relating to the school year, and any information relating to the administrative management of our relationship with you as a client.

The HighSchool Anna de Noailles may process personal data for direct marketing purposes, in order to send commercial communications regarding organised promotional campaigns and available services, where there is an express agreement to do so. Image data may also be processed on the basis of an express agreement in order to create the image of a safe and motivating working environment, as well as to ensure a high level of security and trust for those who wish to participate in the courses available at the Lycée Français.

Finally, we inform you that we will process your data in order to fulfil archiving obligations, obligations to communicate certain information to public authorities upon request or other legal obligations, but there may also be cases where we process your data on the basis of our legitimate interest, for example the prevention of fraud, the establishment, exercise or defence of a right of the Lycée Français Anna de Noailles in a court of law.

For what purposes do we process your data?

We will process the personal data mentioned above for the following purposes:

a. Admission, withdrawal or cancellation of pupils' enrolment and communication with the parents or legal representatives of pupils;

b. Management of diplomas, awards, distinctions, certificates or academic results;

c. Compliance with the regulations of the French or Romanian Ministry of Education, the Agency for French Education Abroad;

d. Organisation of extra-curricular activities, courses and their general administration (project management, communications related to education or school records);

e. Video surveillance of the school and its premises for security reasons, as well as the management of access to the premises;

f. Management of medical needs in case of emergency (person or family contact in case of accident or major risk);

g. Conducting surveys to evaluate and improve the services provided to you;

h. To provide exclusive offers and discounts on selected services, at your request or where you have given your express consent to do so;

- i. Billing and payment of tuition fees, account balances, payment history, etc;
- j. Management of the financial and fiscal activities of the Lycée Français Anna de Noailles
- k. Compliance with legal obligations;
- I. The settlement of requests made by public authorities;

m. Defending the rights and interests of the Lycée Français Anna de Noailles before the courts in the event of litigation.





To whom will we pass on your data?

The Lycée Français Anna de Noailles will pass on your personal data to other natural or legal persons to whom there is a legal obligation to disclose it, or to whom disclosure is necessary to fulfil contractual obligations. In this respect, we mention the following categories of recipients:

a. Partners of the Lycée Français Anna de Noailles who will provide you with school-related services and products;

b. Service providers (such as travel agencies or insurance companies) for extracurricular activities or excursions;

c. Data hosting companies or IT service providers;

d. Accountants, auditors, other professional consultants who will be required by law or contract to keep your data confidential.

e. Public authorities of any kind, central or local, both in Romania and abroad, who will process the data provided at their request or at our initiative, in accordance with the applicable legislation (e.g. ANAF, criminal investigation bodies, etc.)

f. The competent Romanian or foreign court, in the event of a dispute, insofar as this is necessary to establish, exercise or defend a right of the Foundation;

g. The legal entities with which the Lycée Français Anna de Noailles has a contractual relationship, being obliged by law or by contract to respect the confidentiality of your data, or being obliged to disclose your data.

Transfer of your data to a third country or international organisation

Please be advised that the Lycée Français Anna de Noailles does not currently transfer and does not intend to transfer your personal data or any part thereof to other companies, organisations or individuals in third countries or to international organisations, except as mentioned above. **Durée de conservation de vos données**

Your personal data will be kept by the Lycée Français Anna de Noailles for the time necessary to fulfil the purposes of processing indicated above, in compliance with the legal provisions applicable to the specific legislation regarding tax obligations, anti-fraud declarations and legal obligations regarding archiving.

In the event that data processing is based solely on your consent, we inform you that we will process your personal data until you withdraw your consent. In this respect, we would like to point out that you can request the withdrawal of consent at any time, which will not affect the lawfulness of the processing of your data carried out before the withdrawal.

No automated decision-making process

We inform you that you, as a customer or employee, will not be subject to a decision based exclusively on automated processing of your data (including profiling) that produces legal effects on you or similarly affects you to a significant extent.

Security of your data

The Lycée Français Anna de Noailles has put in place technical and organisational measures to ensure the protection of your personal data against unauthorised access, modification, disclosure or destruction of the data processed.





For example:

- Minimisation and/or anonymisation of personal data where possible;

- Limiting access to personal data so that it is only processed by those employees or collaborators who need access to the information to fulfil their legal or contractual obligations;

- Implementing specific policies, including physical and technical security measures

- Auditing the Lycée Français Anna de Noailles' suppliers to ensure that the data processed is protected in accordance with applicable legislation.

Your rights and how to exercise them

Your rights are as follows:

a. The right to access your data processed by the Lycée Français Anna de Noailles, including the right to obtain information about the nature, processing and disclosure of such data;

b. The right to rectify inaccuracies in your data processed by Lycée Français Anna de Noailles;

c. The right to erasure of your data processed by Lycée Français Anna de Noailles ("right to be forgotten");

d. The right to restrict the processing of your data by Lycée Français Anna de Noailles;

e. The right to object to the processing of your data by Lycée Français Anna de Noailles or on behalf of Lycée Français Anna de Noailles;

f. The right to portability of your data to another data controller;

g. The right to withdraw your consent, where the processing of your data has been carried out on the basis of your consent. Please note that you may make this request at any time and that the withdrawal of consent will not affect the lawfulness of the processing of your data carried out prior to the withdrawal.

h. The right to lodge a complaint with the supervisory authority regarding the processing of your data by the Lycée Français Anna de Noailles or on behalf of the Lycée Français Anna de Noailles, respectively with the National Supervisory Authority for Personal Data Processing, B-dul G-ral. Gheorghe

Magheru 28-30, sector 1, postal code 010336, Bucharest, Romania, tel: +04.318.059.211; +04.318.059.212; Fax: +04.318.059.220; e-mail: anspdcp@dataprotection.ro; website: www.dataprotection.ro.

To exercise your rights, as well as for any other questions relating to the information mentioned in this privacy policy, please send an e-mail to the contact details indicated above.

Changes to the privacy policy

We may change the information in this privacy policy when we deem it necessary. Where the change is material to the privacy of your data, we will notify you so that you can review and evaluate the changes and, if you consider it necessary, object or cancel the service/feature. In any case, we recommend that you consult the privacy policy regularly.