

INTERNATIONAL SCHOOL OF RIGA

ANNEX 3

Privacy Notice – Parents

Privacy Notice



The International School of Riga (hereinafter “ISR” or “the School” or “we” or “us”) will gather and use information relating to you (hereinafter also “Parent”) during your and your child’s relations with the School. Information that we hold concerning you is known as your “personal data”. Personal data will include information that we obtain from you directly and data that we obtain from other people and organisations. We might also need to continue to hold personal data for a period of time your and your child’s relations with ISR has ended. Anything that we do with your personal data is known as “processing”. For example, collecting, recording, sharing, storing, or deleting data.

We strive to comply with applicable data protection regulations, including the General Data Protection Regulation, 2018 (hereinafter “GDPR”); and Latvian Personal Data Processing Law (Fizisko Personu Datu Apstrādes Likums, 2018), and therefore provide you with information how we are processing your personal data, as well as information concerning your rights. We also inform you that, as a responsible school, we do not make decisions concerning Parent based solely on automated processing or profiling without human involvement..

This Privacy Notice is based on the terms used in GDPR. ISR reserves the right to make changes to this Privacy Notice from time to time and without prior notice; for example, in light of new developments or legislation. We will not reduce your rights under this Notice, use your data for purposes not covered by it, or reduce the security of your data without your consent. We will post any changes within the Notice, so we recommended that you consult this Privacy Notice regularly.

If significant changes are required we will issue a more prominent notice to you, including notifying you via email.

1. Name and Address of the controller

The controller of your personal data for the purposes of the GDPR, other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

International School of Riga
Kalnciema 118
LV-1046 Riga
Latvia
Phone: +371 6762 4622
Email: info@isriga.lv
Website: www.isriga.lv

The data protection officer of ISR can be contacted at: privacy@isriga.lv.

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2. Collection of your personal data

Most of the information we process about Parents comes from themselves, for example, through School forms (application, permission forms), emails or meetings with teachers and staff. However, we may also obtain information from insurance benefit administrators, consultants and other professionals we may engage, previous schools your child has attended, local authorities or other professionals or bodies, including a court, which might raise concerns in relation to your child, students and their parents, and publicly available resources including online sources. Also, we may obtain information from automated monitoring of our websites and other technical systems such as School computer networks and systems, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and internet facilities, telephones, voicemail and School mobile phone records.

If you fail to provide information to us, we may be prevented from complying with our legal obligations. In such cases we may be unable to enter into contract with you. We will also be unable to enter into contract with you, if you fail to provide the information necessary for the enrolment of your child in the School and concluding the respective contract (see Section 5 of this Privacy Notice).

3. Recipients of your personal data

We may share information about Parents with:

- local authorities, to assist them in the exercise of their responsibilities to education and training, youth support and safeguarding purposes;
- the Ministry of Education, Riga municipality, State Revenue Service, National Education Information system, in compliance with legal obligations of the school to provide information about Parents as part of statutory data collections;
- schools, colleges or universities where your child intends to or is attending after leaving ISR; and other international schools (for the purposes of student trips, sports events or other inter-school activities);
- medical and social service organizations (amongst others where sharing is in the vital interests, or where not sharing could have a negative impact on your child);
- local education authorities and municipal offices (when applicable)
- contractors, such as payment processing providers, and other personal data processors whose services ISR uses, such as Google and Microsoft, to enable them to provide an adequate service to the School;
- professional advisors including legal consultants;
- law enforcement and social services, if unlawful actions are detected or suspected;
- health authorities, if necessary.

More information on these measures can be requested via the school data protection officer.

4. Security of your personal data

Your personal data are stored on our own servers and on the servers of our student management system provider, located in the UK. Where the law allows and information is shared with third parties (data processors), we ensure they have the same protections in place as we do. We cannot deliver our education services without processing the data we collect and share.

We have in place proportionate organisational and technical measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage, including but not limited to the use of passwords, firewalls, encryption, system access audits, principle of least privilege and fireproof archive storage. More information on these measures can be requested via the school data protection officer.

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5. Processing of Personal Data in Digital Systems

ISR uses digital platforms for communication with families, organisation of the educational process, and the administration of operational processes, including Toddle, Google Workspace, and other systems used by ISR. The following categories of personal data may be processed within these platforms: name and surname, email address, telephone number, address, communication records, consent information, information regarding the relationship to the student, workplace and job title, where such information is provided to ISR.

The Toddle platform is used for communication with families, tracking student progress, attendance management, portfolio creation, assessment, and other functions related to the educational process. Parents or authorised guardians may be granted access to the Toddle family application or web portal.

Some of the platforms used by ISR, or their sub-processors, may be located outside the European Economic Area (EEA). In such cases, ISR ensures the implementation of appropriate GDPR-compliant safeguards.

The platforms used by ISR may provide analytics, activity history tracking, and automated recommendations for teachers; however, ISR does not make decisions concerning students based solely on automated processing or profiling without human involvement.

6. Photo and Video

ISR may use students' photographs, videos, yearbook materials, and other materials related to school life for communication, documentation, and marketing purposes, on the basis of consent or another applicable legal basis. Consents are documented, including through the use of consent forms.

The legal basis on which ISR will rely on to process Parents personal data will typically be one of the following:

Consent: publishing focused images of Parents on the ISR website, intranet, streaming platforms, and social media profiles (e.g., Facebook, Instagram, YouTube, etc.) for purposes related to maintaining corporate culture, promoting the brand, and marketing activities. Written consent will be obtained in advance if ISR wishes to involve Parent in marketing materials where Parent will be the focus of marketing activities, such as an interview or a brochure. Further processing of focused personal data obtained from ISR internal events, and other activities for external purposes (e.g., publication of Parents personal data on external social networks, in outward-facing brochures, leaflets, advertising materials, interviews) will be carried out based on written consent. You have the right to withdraw your consent at any time; or

Legitimate interests:

- Maintaining and promoting the school community through internal and external communication channels, including the school website, newsletters, social media platforms, and other official school publications.
- Documenting and sharing educational, cultural, sporting, charitable, and community activities that form part of school life, including student achievements, school events, competitions, performances, and other activities related to the school's educational mission.
- During school-organized events, photography and filming may take place. Unless otherwise specified, photographs and videos capturing performances, group activities, ceremonial events, audience views, and general scenes of the school environment may be processed by the ISR on the basis of its legitimate interests in documenting and promoting school activities. Such materials may be used in internal communications, yearbooks, newsletters, the school website, and official social media channels.
- Preserving the history and traditions of the ISR through the creation and maintenance of archives containing photographs, videos, publications and records of significant school events and achievements.

Video surveillance may be used for security purposes in common areas on the premises of ISR.

7. Your personal data processed by us

We process your personal data for the following reasons and legal basis.

Personal data types	Purpose	Legal basis	Storage period
Invoicing			
Name, surname, home address, e-mail.	Revenue and expense recognition.	GDPR 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party.	5 or 10 years according to type activity (commercial or civil), basis: Section 28 of Accountancy Law, Section 1895 of Civil Law.
Internal audit / external audit / annual reviews			
Personal data contained in contracts and invoices, including name, surname, personal identity number, invoice and payment information (date, sum, recipient, sender).	Control and monitoring of ISR's finance data.	- GDPR 6(1)(c): processing is necessary for compliance with a legal obligation to which ISR is subject, basis: Law on annual accounts and consolidated annual accounts, - GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: oversight of commercial activities and finances.	- Annual reports: until reorganization or termination of ISR, basis: Section 28 of Accountancy Law, - all other personal data: 10 years, basis: Section 28 of Accountancy Law.
Use of computers, telephones, internet			
Name, surname, telephone number, email address, usage logs and data of IT systems, information about the use of physical IT equipment.	Creation and management of user rights and access, as well as managing restrictions, management of physical IT equipment.	GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: management of ISR's technical resources.	- While your child is studying in ISR. - While usage logs and data of IT systems are relevant.
Managing Student application process and enrolling them in ISR			
Name, surname, date of birth, personal identification number (if applicable), email address, phone number, home address, job title/occupation, company name, relationship with child, language, second language, English proficiency, employer.	Selection of Student candidates and concluding contracts with students and Parents, assistance for obtaining residence permits or visas.	- GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data, - GDPR 6(1)(b): processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. - Special categories of personal data: GDPR9(2)(h): processing is necessary for treatment or the management of health on the basis of law: Section 3 of Psychologist Law.	- If application is unsuccessful: end of current year's application process. - If application is successful: 10 years after the end of studies in ISR, basis: Section 1895 of Civil Law, Section 28 of Accounting Law, - other personal data: end of studies in ISR.
Managing Student's studies in ISR			
Name, surname, email address, phone number, home address, profession/occupation, employer.	Providing education.	- GDPR 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party, - GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: management and control of study process, - GDPR 6(1)(e): processing is necessary for the performance of a task carried out	- General data – one year after the end of studies, - records with archival value: 75 years, basis: Archives Law.

		in the public interest or in the exercise of official authority vested in the controller, basis: Cabinet Regulation No 709.	
Managing Extracurricular activities in ISR			
Name, surname, email address, phone number, authorizations given.	Managing and organizing extracurricular activities in ISR (field trips, sport games etc.).	• GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: management and control of extracurricular activities, • GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data.	• Authorization – during Students studies in ISR or until authorization is no longer required due to the Student's age, or until authorization is revoked, • other personal data – while needed for the respective extracurricular activity.
Management of Parents' satisfaction surveys			
Name, surname, e-mail, personal data disclosed in survey	Evaluating feedback provided by Parents.	• GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data, • GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: improvement of ISR's services.	Until suggestions are addressed.
Managing parental authorizations concerning their children			
Name, surname, e-mail, phone number.	Ensuring that persons meeting Students after studies have been authorized by their Parents.	• GDPR 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person, • GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data.	During Students studies in ISR or until authorization is no longer required due to the Student's age, or until authorization is revoked.
Recording data in the National Education Information System			
Name, surname, personal identification number, residential address (for children under 18 years of age).	Compliance with legal requirements.	GDPR 6(1)(c): processing is necessary for compliance with a legal obligation to which ISR is subject, basis: Section 12 Paragraph 2 of International School Law, Section 50 of Education Law, Cabinet Regulation No 276 "Procedure of State Education Information System".	Information is archived according to Cabinet Regulation No 276.
Video surveillance			
Video recording	Monitoring premises and grounds (indoors and outdoors, entrances), protecting property and other assets, ensuring the safety of	GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: protecting ISR's property and other assets, ensuring the safety of Students, Parents and Employees.	15-30 days, depending on the quality of recording and building.

	Students, Parents and Employees.		
Audio message storage			
Audio recording	Recording messages from callers.	• GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data, • GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: managing communication with clients and Employees of ISR.	Until the issue addressed in the recorded message is resolved, up to one month.
Managing e-mail enquiries			
Personal data contained in e-mail messages	Responding to enquiries.	• GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data, • GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: managing communication with clients and Employees of ISR, maintaining official e-mail address of school.	Until the issue addressed in e-mail is resolved.
Register of members			
Name, surname, date of birth, personal identification number, number and date of issue of the identity document, country of issue.	Maintaining the Association	GDPR 6(1)(c): processing is necessary for compliance with a legal obligation to which ISR is subject, basis: Law on Associations and Foundations.	Data are stored during the entire existence of the association.
Members' meetings			
Name, surname, e-mail address, remarks made during meetings	Maintaining the Association	GDPR 6(1)(c): processing is necessary for compliance with a legal obligation to which ISR is subject, basis: Law on Associations and Foundations.	Data are stored during the entire existence of the association.
Remote voting system			
Name, surname, voter number, voter email, participant group, number of votes, IP address.	Maintaining the Association	GDPR 6(1)(c): processing is necessary for compliance with a legal obligation to which ISR is subject, basis: Law on Associations and Foundations.	Data are stored during the entire existence of the association.
Handling complaints and claims			
Name, correspondence address, telephone number, e-mail address, date of submitting the complaint, personal data disclosed in the complaint	Investigating the complaint and preparing a reply	• GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data, • GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR, basis: ensuring the proper functioning of the association.	Data are stored during the entire existence of the association.
Health record monitoring, medical incident and nurse appointment recordkeeping and journaling			

Personal data disclosed in e-mails stating information/reasons about absence.	Information about the person's state of health, to report sick leave.	Cabinet Regulation No 276 "National education information system rules".	During the student's studies in ISR.
Monitoring for signs of child abuse			
Personal data that could be related to violence and sexual offences, data on sexual offences, and health data (signs of violence)	Protection of children's rights	- GDPR 6(1)(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person, - GDPR 6(1)(c): processing is necessary for compliance with a legal obligation to which ISR is subject, basis: United Nations Convention on the Rights of the Child, Articles 19 and 34. - Special categories of personal data: GDPR 9(2)(c): processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.	Purpose of data processing achieved.
Publishing advertisements, marketing materials and articles			
Photographs, name, surname.	Marketing activities	- GDPR 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by ISR: raising the profile of the school, informing about events and enrolment procedures, documenting and sharing educational, cultural, sporting, charitable, and community activities that form part of school life, preserving the history and traditions. - GDPR 6(1)(a): The Data Subject has given consent to the processing of their personal data.	Until not relevant concerning the respective legitimate interests or consent is revoked.

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8. Your rights

You have the following rights in relation to your personal data processed by us.

a. Right of confirmation

You have the right to obtain from us the confirmation as to whether or not personal data concerning you are being processed. If you wish to avail himself of this right of confirmation, you may, at any time, contact us.

b. Right of access

You have the right to obtain from us information about your personal data stored at any time and a copy of this information. Furthermore, you access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from us rectification or erasure of personal data, or restriction of processing of personal data concerning you, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from you, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for you.
- Furthermore, you have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, you will have the right to be informed of the appropriate safeguards relating to the transfer.

If you wish to avail himself of this right of access, you may, at any time, contact us.

c. Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If you wish to exercise this right to rectification, you may, at any time, contact us.

d. Right to erasure (right to be forgotten)

You have the right to obtain from us the erasure of personal data concerning you without undue delay, and we shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

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- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- You withdraw consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- You object to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in European Union or member state law to which we are subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of GDPR.

If one of the aforementioned reasons applies, and you wish to request the erasure of personal data stored by ISR, you may, at any time, contact us.

Where we have made personal data public and are obliged pursuant to Article 17(1) of GDPR to erase the personal data, we, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that you have requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required.

e. Right of restriction of processing

You have the right to obtain from us restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by you, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and you oppose the erasure of the personal data and request instead the restriction of their use instead.
- We no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.
- You have objected to processing pursuant to Article 21(1) of GDPR pending the verification whether the legitimate grounds of us override those of you.

If one of the aforementioned conditions is met, and you wish to request the restriction of the processing of personal data stored by ISR, you may at any time contact us.

f. Right to data portability

You have the right to receive the personal data concerning you, which was provided to us, in a structured, commonly used and machine-readable format. You have the right to transmit those data to another controller without hindrance from us, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by

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automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

Furthermore, in exercising your right to data portability pursuant to Article 20(1) of the GDPR, you have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, you may at any time contact us.

g. Right to object

You have the right to object, on grounds relating to your particular situation, at any time, to processing of personal data concerning you, which is based on point (e) or (f) of Article 6(1) of the GDPR.

ISR shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of you, or for the establishment, exercise or defense of legal claims.

If ISR processes personal data for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing. If you object to processing for direct marketing purposes, ISR will no longer process the personal data for these purposes.

In addition, you have the right, on grounds relating to your particular situation, to object to processing of personal data concerning you by ISR for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, you may contact ISR.

In addition, you are free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use your right to object by automated means using technical specifications.

h. Right to withdraw data protection consent

You have the right to withdraw your consent to processing of his or her personal data at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise the right to withdraw the consent, you may, at any time, contact us.

All queries regarding privacy can be submitted via e-mail at privacy@isriga.lv or in ISR webpage by completing and submitting the "Update my privacy settings" form [here](#).

You can also contact the Latvian Data State Inspectorate, should you consider it to be necessary to file a complaint, at:

Elijas iela 17, Rīga,
LV-1050, Latvia
Email: pasts@dvi.gov.lv
Phone: 67 22 31 31
<https://www.dvi.gov.lv/en/>

The European Union has a useful website concerning the General Data Protection Regulation (GDPR) [here](#).



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