



PRIVACY POLICY

1. INTRODUCTION

This policy is in accordance with the Portuguese Data Protection Law n. ° 58/2019 of August 8, 2019 and the General Data Protection Regulation (EU) 2016/679 of April 27, 2016 regarding the protection on the processing of personal data.

2. TYPES OF PROCESSED DATA

We process personal data from our students and their families and / or legal representative and also from our employees, candidates, suppliers, contractors, prospective customers as well as third parties interested in finding out more about Lisbon Montessori School.

The personal data processed are:

- Names, addresses, phone numbers and e-mails;
- Family information;
- Safeguarding information (such as court orders or legal representative)
- Education and employment data;
- Photos, audio and video;
- Financial information;
- Schools previously attended.

Other types of data we may collect and process, according to the school purposes, are related to health condition, criminal records and other sensitive information related to an individual, such as:

- Information about health status;
- Behavioural information;
- Special educational needs;
- Criminal records linked to a specific individual;
- Biometric information;
- Ethnicity;



- Religion;
 - Nationality and location.
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3. HOW WE COLLECT AND PROCESS PERSONAL DATA

Lisbon Montessori School collects information in several ways, including:

- In person and / or by phone.
 - Through our webpage: email, LMS Questionnaire and LMS Application Form;
 - From email and hand delivery paper documentation: including job applications, emails, invoices, letters, consent forms;
 - Through online tools: such as apps, educational platforms and other software;
 - Through third parties, such as referees, professionals or authorities working with the individual;
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4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

Lisbon Montessori School processes personal data to legally carry out the school's educational activity. The school collects and keeps students and parents' information when necessary:

- To ensure that the student meets the school's admission criteria;
- To provide educational services including the support of pupil learning, monitor and report on pupil progress;
- To provide insurance to the students;
- To meet the educational, social, physical and emotional requirements of the student;
- To comply with the law regarding sharing and disclosure of personal data;
- To comply with legislative or administrative requirements;
- For the management of the school Administration.
- To enable parents/guardians to be contacted in the case of emergency or in the case of school closure, or to inform parents of their child's educational progress or about school events, etc.
- In the case of a CV received through our webpage, by email or post, with the purpose to include the candidate in the selection process or to consider



their application for future positions; In this regarding, the school also collects information about staff and prospective staff when necessary for:

- Conducting the selection process;
- Assessing the suitability of the candidate for the position;
- Administration of staff records;
- Recruitment of staff;
- Administration of payroll, pensions and sick leave;
- Staff appraisal;
- Disciplinary procedures;
- Administration of human resources records;

Personal data processed may only be communicated to other schools with prior written consent of the data subject and the personal data will be processed with the same legitimate purposes mentioned herein.

5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

As a school, we may be lawfully required to share personal information with relevant authorities to comply with legal obligations or based on a specific consent given by the individual to whom is concerned.

We will ensure that, when relevant, contractual safeguards will be implemented to ensure the protection of your personal data when disclosing your personal data to third parties.

The parties to whom we may disclose your personal data as mentioned above, may be located in countries outside the school's location, including countries which may offer a lower level of data protection. In such cases, we will implement appropriate measures to ensure adequate protection of your personal data in accordance with applicable data protection legislation.

Your personal data shall be neither rented nor sold to third parties.



6. CONSERVATION OF DATA

Personal information will only be retained for the period of time required to fulfil the purpose for which it was collected. It may be kept for a longer time for public interest archiving, scientific or historical research, or statistical purposes. Once the personal information is no longer required or permitted to be retained for legal or business purposes, it will be destroyed.

7. YOUR RIGHTS

Under the Portuguese Law no. 58/2019 and the EU GDPR, you have rights regarding the processing of your personal data. These rights are, however, subject to certain exemptions and limitations.

You have the right to:

- Be informed, at the time when personal data is collected, about the data processing.
- Access the information we process and how we process it as well as to obtain a copy of the personal data considering the legal limitations and exceptions;
- Ask for the erasing of the personal data we hold about you without undue delay considering the legal limitations and exceptions;
- Obtain the rectification of your personal data;
- Obtain restriction of processing of your personal data when it is inaccurate, illegal, unnecessary or not verified, considering the legal limitations and exceptions;
- Obtain data portability of your personal information in a structured, commonly used and machine-readable format. This allows the right to transmit that data to another controller without hindrance from the controller to which the personal data has been provided;
- Oppose to processing for direct marketing purposes.
- Withdraw consent at any time and freely to the processing of your personal data. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Therefore, individuals will be able to exercise their rights by sending a specific written request, along with a copy of their ID card, to the Data Protection Officer email miguel@lisbonmontessori.org



Data subjects have the right to be notified of the information that is being processed about them, as well as the access to their personal data verbally or in writing and at no charge.

The data subjects have also the right to request, when necessary, the correction, destruction or deletion of their personal information and to object, on reasonable grounds relating to their particular situation to the processing of their personal information. The data subjects have also the right of not to have their personal information processed for purposes of direct marketing by means of unsolicited electronic communications, not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of their personal information and to submit a complaint to the Regulator regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Information Regulator in respect of a determination of an adjudicator as well as to institute civil proceedings regarding the alleged interference with the protection of his, her or its personal information.

According to this, we have processes in place to ensure that we respond to a request without undue delay from the date of the request although we can extend the time limit to respond if necessary. We are aware of the information we must provide in response to a request and the need to provide it in clear and plain language.

Any request is subject to certain exemptions, limitations or contractual obligations. Data belonging to or identifying other individuals is exempt from right of access and will be subject to legal privilege. We cannot disclose any confidential information related to the purpose of providing education within our school, examinations or supplying examination scripts to external bodies. We cannot disclose confidential information on any of our staff.

8. CONSENT

You have the right to withdraw your consent for any specific purpose granted at any given time without prejudice of the legality of processing according to the consent given before withdrawal.



9. STORING AND SECURING INFORMATION

The school shall use the appropriate technical and organizational measures to ensure the security, confidentiality, integrity and privacy of the personal data, preventing from unauthorized access or unlawful processing as well as accidental loss, destruction or damage of the files.

10. COMPLAINTS

If you are not satisfied with our privacy policy or believe that we are processing your personal data disregarding the data protection law, please contact our Data Protection Officer at: miguel@lisbonmontessori.org or you can address your complaint to the CNPD - *Comissão Nacional de Protecção de Dados* (National Commission for the Protection of Data) headquartered at Av. D. Carlos I, 134 – 1.º, 1200-651 Lisboa, phone number + 351 21 392 84 00, website https://www.cnpd.pt/home/direitos/direitos.htm#exercer_direitos with the email geral@cnpd.pt

11. PRIVACY NOTICE UPDATES

Lisbon Montessori School updates its privacy policy periodically.

RESPONSIBILITY FOR PROCESSING PERSONAL DATA

LMS – Lisbon Montessori School, Lda

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