



General Data Protection Regulation (GDPR)

The European GDPR came into force on 25th May 2018. This page is to tell you what Britannica International School, Budapest has in place to ensure we are fully compliant.

Definitions:

- **'Personal data'** means any information that may (either on its own or in combination with other information) be capable of identifying a living person.
- **'Processing'** includes anything from using, collecting, storing, accessing, deleting, extracting or transferring

Of course, your data has always been protected within our systems, but the new GDPR gives individuals new rights and freedoms not afforded by the current Data Protection Act.

Questions	Comments
Name of Supplier	Britannica International School
Is Britannica International School a Data Controller?	Yes
Is Britannica International School a Data Processor?	Yes
Does Britannica International School have a Data Protection Officer?	No. Due to the nature of Britannica International School's service and data management, there is no requirement for this post.
Who is the senior person responsible for information security and data protection at Britannica International School?	Neil McGarry Information security and data protection is now a standing agenda item for Britannica International School SLT Meetings.
Who is the senior person with overall responsibility for security at Britannica International School?	Neil McGarry



What service is Britannica International School?	Britannica International School provides a British style education to students between the ages of 5 and 18.
In providing this service, is Britannica International School processing personal data belonging to its customers?	Yes. The organisation data (organisation name, address, URL, key business and contact information) is stored securely on Britannica International School's Information Systems and Administration Management System (ISAMS) for the purpose of managing the relationship and ensuring the health, safety and protection from harm, according to the school's child protection policies and procedures. The organisation's individual learner data (first/last name and email) is stored on Britannica International School's Learner Management System.
Does Britannica International School process sensitive special category data?	No
What security standards does Britannica International School have in place to keep personal data secure?	We take students, parents and staff privacy and security very seriously. GDPR ready: <ul style="list-style-type: none">• We have analysed all the data that comes into our ISAMS database in line with GDPR regulations• We have updated all our internal systems, policies, contracts and processes in line with GDPR regulations
What policies and procedures are in place and how does Britannica International School ensure they are followed?	The school has an annually reviewed DP Policy. It is a standing item at Senior Management Meetings and all staff will or have been trained on the regulations of Data Protection
How often are Britannica International School policies and procedures reviewed?	Annually.
Does Britannica International School appoint other companies or organisations to process personal data?	Yes. Britannica International School works with external third-party service providers to support and host the LMS, the IT infrastructure and website, plus professional services such as accountants, auditors and marketing agencies who assist us in carrying out



	<p>business activities. Britannica International School carries out due diligence on third-party suppliers related to their position on GDPR. All our systems are located within the UK or EEA. Access to organisation data and individual learner data is only allowed when required by law. We do not, and will never, sell or share your personal information with third parties for marketing purposes.</p>
<p>Does Britannica International School ever transfer personal data outside Hungary? If so, please specify where.</p>	<p>No. Our LMS stores data with Amazon Web Services (AWS) and they meet the EU-US Privacy Shield framework adopted by the European Commission. This complies with data protection requirements and GDPR legislation when transferring data outside of the EU.</p>
<p>Who has access to the data regarding customer data subjects?</p>	<p>Our staff team have access to the data for the purpose of registration, reporting and liaising with parents regarding the progress of their children, training and to support learners with day-to-day needs. Our LMS stores data with Amazon Web Services (AWS) and they meet the EU-US Privacy Shield framework adopted by the European Commission. We have suppliers who support and develop our systems, but they do not process any data. All Britannica International School third-party suppliers are GDPR compliant or are working towards it.</p>
<p>Does Britannica International School have signed contracts and statements of works between the data controller, data processor and third parties?</p>	<p>Yes. Contracts are reviewed annually, or when renegotiating continuity of service.</p>
<p>Does Britannica International School, as the data processor, have a written contract?</p>	<p>These are agreed with parents at the point of registration at the school.</p>
<p>How is this data gathered?</p>	<p>Learner and parent contact data is gathered via admission forms completed by parents. The data is then uploaded onto our LMS</p>



How does Britannica International School ensure consent for the data's use has been obtained by the Data Controller?	When the parent confirms their agreement to their child registering with Britannica consent is agreed between the parties at this stage, as mentioned in the T&C s of the contract.
How will data be provided in response to any EU Citizen Subject Access Requests for data?	A subject access request will follow our internal process and be responded to within the period required by law. Please see our privacy statement.
What happens to personal data when the service contract ends?	Three months after the contract expiry date has passed, if no service renewal has been agreed – Britannica International School will: <ul style="list-style-type: none">• Permanently delete the learner data and training history from the LMS.• Retain the parents financial transactional details, in line with legal retention requirements.• Retain the organisation data and key contact details on the CRM system.• Continue to keep the authorities updated about essential safeguarding and duty of care matters and products, whereby parents will be given the opportunity to 'opt out' if they wish.,