

The European Privacy Act, the General Data Protection Regulation (GDPR), protects adults and children from inappropriate use of personal data. The school observes these rules. At our school we take great care of the privacy of our pupils and their parent(s)/carer(s).

We consider it important to provide clarity about this. In this Privacy Statement we explain how we deal with your and your child's/children's personal details. So this is intended for parents and carers. Where child, parent or carer is written in singular, it can also be taken to mean plural.

This privacy policy is applicable to the processing of personal data by primary school OBS de Rietpluim (school, we, our), subordinate to the authority of the PlatOO foundation (**Data Controller**).

To whom and when does this Privacy Statement apply?

This Privacy Statement applies to you when you register your child at our school and when your child is taught by us. This Privacy Statement provides you as the parent or carer with information about the processing of personal data about your child and yourself.

Which personal details do we process?

We make a distinction between various data processing that we execute to be able to offer education. Below we explain which (categories) of personal data we process.

1. **Registration with us at school.** During registration we request that you enter various personal details as indicated on the registration form. We will at least ask you for the following personal details:
 - a. Your child's personal details. First name and last name, gender, date of birth, address and place, BSN citizen service number (or temporary education number), nationality, language at home, details about preschool education, previous school, date of registration and name of general practitioner. You can opt to state particulars, for example if extra physical or mental support is required.
 - b. Your personal details. First name and last name, date of birth, country of birth, address and place, nationality, profession, education, telephone number, email address and details about family situation.
2. **Details required for the provision of education and supervision.** To be able to provide education, we register details about your child's progress at school, such as class number, marks and progress reports. We keep a record of absences. When your child leaves school we draw up an educational report about your child's school progress and learning capacities. This contains data about results, development, behaviour and absence. We can also record school advice and score for national tests (like Cito). Sometimes it is necessary to process special personal details to help in teaching your child, which can include medical details (like information about dyslexia, ADHD or about allergies). We can also process personal data that is necessary for offering (digital)

teaching materials. This can, for example, concern a login name and password, an IP-address, your child's class and your child's level. Furthermore, we can process personal details for you and your child that are connected with your contact with the school, for example if you have questions or complaints. When you make payments to school, we can process your bank details (IBAN).

What do we use this personal data for?

There are various reasons why we need to use your and your child's personal data. A list of these reasons follows below:

1. To be able to register your child at our school, for the admission and placement in our school.
2. For the organisation of education by us, for teaching and supervising your child, providing advice about education based on your child's progress.
3. To keep you informed about your child's progress.
4. To be able to offer (digital) educational and teaching materials.
5. To be able to inform, communicate and work together online in the lessons.
6. For the transfer of your child from our school to another educational institution.
7. For the calculation, recording and collection of reimbursements for teaching materials and extracurricular activities.
8. For internal and external communication for and about the school.
9. For extracurricular activities like school trips and parental activities.
10. To invite parents, based on their profession, to contribute to themes or topics in the classroom or at school.
11. To provide parents with an opportunity to contact each other.
12. For the cooperation of schools within the foundation.
13. To be able to answer your questions and settle any complaints.
14. To offer pupils a suitable and safe learning environment, both physically and digitally.
15. To comply with obligations that stem from the Primary Education Act.

What is the basis for processing personal data?

We only process personal data if there is a legal basis to do so.

- Statutory obligation. We are obliged by law to process some of your child's personal data. We are obliged to use a pupil administration and pupil monitoring system to communicate with BRON (Basisregistratie Onderwijsnummer, Basic registration education number) controlled by the government institution Education Executive Agency (Dienst Uitvoering Onderwijs=DUO) and to record the progress and results of our pupils within the scope of quality for the Inspectorate of Education. In addition, we are, as is every school, obliged to prepare an educational report when your child leaves to attend a different school. Finally, we have a legal obligation with regard to the quality of the education that we offer. Here too it is necessary to process some of your child's personal data.

- Registering as an agreement/Legitimate interest. We can consider it important to process personal data as a result of our own legitimate interest. We do this within the scope of the registration as an agreement in which we are transparent in advance in our School Guide or School Plan about what the legitimate interest is. For example, we use images for internal training activities. Or we admit students, for training and work experience purposes, to participate in our school's daily practice. We consider this our social and educational duty. Of course, they use personal data too. We reach agreements about this with our employees and work experience students and their training institutes.
- General interest. It can be necessary to provide a body with personal data in connection with its public law tasks, such as the authorised body for inspection (Inspectorate of Education) or the Municipal Health Services (GGD). We will run a sound administration with regards to this.
- Permission. In certain circumstances we may ask for permission in advance prior to processing the data. We will ask if we may include your contact details in the class list and offer you the possibility of keeping your address and telephone number secret. We will also ask your permission for using images of your child in the school guide, brochure, newsletter on our website or for our social media channels. You can withdraw your permission at any time through contacting us through the contact details below. Finally, we will request your permission for passing on your child's personal details to the library, if you wish to make use of the library services via us.

With whom may we share personal data?

In certain circumstances we can share your personal data with third parties. We only do this when it is necessary for the objectives as described in this Privacy Statement, and particularly in the provision of education and the safeguarding of the quality of the education.

- External suppliers/Processors. We make use of a number of third-party services to support the education and they process your and your child's personal data as a processor. For example, we have agreements with supplier Rovict of a pupil administration and pupil monitoring system ESIS.

In addition, we employ digital teaching aids, that we offer through the Stichting Basispoort portal. A list of a significant selection of the digital teaching aids we use can be found in the appendix to this Privacy Statement. If you would like to know how suppliers of digital teaching materials handle pupil data, you can read about this in the privacy inserts.

- Government institutions. We can share your child's personal details with government institutions, as far as this is necessary for the exercise of a task in the public interest or in connection with a legal obligation. This can for example be data that we are obliged to share with the authorised institutions, like the Inspectorate of Education, Education Executive Agency (DUO) or the Municipal Health Services (GGD). We also have to share

your child's personal data with another school (management) when he or she transfers to another school. This is recorded in the educational report. Within the scope of Appropriate Education (Passend Onderwijs) we also share personal data with Interinstitutional Groupings. The government institution receiving the data is an independent controller and must observe the applicable privacy obligations.

- Library. In support of your child's education, you can opt for him/her to register with the Library through us. This is not obligatory. We request your permission to pass on personal data to the Library such as name, group and home address. The Library processes this personal data as a data controller for its own purposes and must observe the obligations in conjunction with privacy independently.
- Other parents. If you have agreed to this, we can also share your personal data and that of your child with other parents, for example on class lists or publish images through online communication networks (such as our Rietpluim App or our website). We do not have any control over the further processing of your personal data by third parties who take cognisance of the personal data on the class list or the images disseminated through the aforementioned communication networks.

When we share personal data with third parties, they will not process the data outside the European Economic Area, unless additional agreements have been entered into with these third parties, or when measures have been taken that ensure that the privacy of you and your child are safeguarded.

Is your personal data safe?

We have taken various appropriate technical and organisational security measures to protect your and your child's personal data that we process from loss or unlawful use. We protect our systems and applications in accordance with applicable standards for the protection of information. We have also reached agreements with suppliers of (among other things) pupil administration and pupil monitoring systems and obligated them to take appropriate security measures.

How long do we store your child's personal data?

We only keep personal data for as long as this is necessary for the objectives stated in this Privacy Statement. In principle, we keep your and your child's personal data in the pupil's records for two years after your child has left school. It may be possible that we keep certain personal data for longer than two years, for example when legally obligated or when this is necessary to protect your and/or our rights. In connection with the legal obligation that rests with absence records we keep this data for a minimum of five years. We keep personal data within the scope of financial funding of our education for seven years.

Request for inspection, rectification and removal

Anyone involved can, based on the law, exercise rights with regard to his or her personal data. You have a right to inspection, rectification and removal of personal data that is to do with you. You can exercise these rights on behalf of your child. You can also object to use of your or your child's data and ask for this use to be curtailed. When you exercise your rights, you can send your request to the contact address at the bottom of this Privacy Statement. Please indicate clearly which personal data you wish to inspect, rectify or supplement.

Complaints

If you have a complaint about the way in which we have handled your personal data, you can contact us through the details as stated in 'School contact details' or you can contact the PlatOO foundation Data Protection Officer directly.

We would be pleased to help you find a solution. If this proves to be unsuccessful, you can always approach the data protection authority [Autoriteit Persoonsgegevens](#).

School contact details

OBS de Rietpluim
Ouwlandsedijk 27
5673 PS Nuenen
Erik Adema (school director)
040 – 284 11 11
rietpluim@derietpluim.nl

PlatOO contact details

The competent authority for the PlatOO foundation is the **Data Controller** for the data processing as described in this Privacy Statement. The competent authority is established on Deurneseweg 13, 5709 AH in Helmond.

PlatOO has an Officer for Data Protection (FG) that ensures observance of the applicable privacy laws and legislation within our organisation. You can approach our FG with questions about your personal data that we process and to exercise your rights as described in detail in this Privacy Statement.

Contact details PlatOO Data Protection Officer

E-mail: fg@platoo.nl
Telephone: 0492-792401

Amendments

Developments follow each other in rapid succession and as such things can sometimes change in the personal data that we request from you and the way in which we process your personal data. Regulations can change too. This is why from time to time we amend our Privacy Statement and we advise you to refer to it regularly.

This Privacy Statement was last amended on 10 December 2019.

Appendix with Privacy Statement

List of suppliers of pupil administration and pupil monitoring systems, and suppliers of digital teaching aids, whereby personal data is processed (**Processors**), with which Processing Agreements have been entered.

| Supplier | Description of service | Privacy insert |
|------------------------------|---|--|
| Rovict BV | ESIS: pupil-administration- and pupil monitoring system | https://www.rovict.nl/nieuws/nieuws-overzicht/privacy |
| Google | G Suite for Education: Online environment for informing, communicating, working (together) and sharing knowledge | https://edu.google.com/intl/nl_ALL/why-google/privacy-security/?modal_active=none |
| Stichting Basispoort | Portal for accessing digital teaching materials from Heutink Primair Onderwijs BV, de Rolf Groep, L.C.G. Malmberg BV, Noordhoff Uitgevers, Reinders Oisterwijk BV, ThiemeMeulenhoff BV, Uitgeverij Zwijsen BV | http://info.basispoort.nl/Privacy-AVGGDPR/Verwerkersovereenkomst (see processing agreement - appendix 1) |
| Heutink Primair Onderwijs BV | Indicates which services and/or methods are employed by the school | https://www.heutink-ict.nl/dit-zijn-wij/privacy/convenant (see 'Appendix 1' under 'Download Processing Agreement' – also for MOO) |
| de Rolf Groep | Incidental | https://www.derolfgroep.nl/privacy/ (see appendix 1 under download processing agreement under the heading 'Entering a processing agreement with de Rolf groep) |
| Malmberg BV | Lijn 3 Station Zuid Staal Kleuterplein | https://www.malmberg.nl/artikelen/verwerkersovereenkomst-afsluiten.htm (see appendix 2 for the processing agreement by clicking on 'Primary Education' under the heading 'Download the processing agreement') |
| Noordhoff Uitgevers | Rekenrijk | https://www.noordhoffuitgevers.nl/n Noordhoff-uitgevers/privacy-en-cookies (see appendix 2 for the processing agreement– to be downloaded via the section Noordhoff Uitgevers as 'processor') |

| | | |
|-----------------------------------|------------------------------|--|
| Reinders Oisterwijk BV | Licences for method software | See Heutink Primair Onderwijs BV |
| Thieme Meulenhoff BV | Incidental | https://www.thiememeulenhoff.nl/privacy |
| Uitgeverij Zwijsen BV | Incidental | https://www.zwijsen.nl/privacyverklaring-verwerking-persoonsgegevens-digitale-leermiddelen (indicate which privacy insert 1 is applicable for the school concerned and also insert 2) |
| ConCapps | Basisschool App | https://concapps.zendesk.com/hc/nl/articles/115004001865-Privacy-reglement |
| Silvas | Schoolgesprek.nl | https://www.schoolgesprek.nl/wp-content/uploads/2017/10/privacy_schoolgesprek.pdf |
| Bureau ICE | IEP final test | https://www.bureau-ice.nl/privacy-statement/ |
| IsScreen b.v. | Talentenkompas | https://www.iscreen.nl/privacy-policy |
| Kwintessens | SCOL (processing via ESIS) | https://www.kwintessens.nl/privacy_leermiddelen |
| Prowise? | Oefenweb | https://www.oefenweb.nl/over-oefenweb/privacy/ |
| Uitgeverij Koninklijke van Gorcum | HOREB | https://www.vangorcum.nl/voorwaarden/privacy-policy |
| Momento? | | https://www.vangorcum.nl/voorwaarden/privacy-policy |
| Muiswerk Educatie | Muiswerk | http://cdn.muiswerk.nl/Privacyverklaring.pdf |
| Schoolpoort | | https://schoolpoort.nl/privacy/ |
| Cito | LVS tests | https://www.cito.nl/over-cito/contact/privacyverklaring |
| | | |