

# ICSV Privacy Notice for Applicants

## Introduction

This notice is to help you understand **how** and **why** we collect your personal information and **what** we do with that information **in case of employment**. It also explains the decisions that you can make about your own information.

If you have any questions about this notice please contact [hr@icsv.at](mailto:hr@icsv.at).

## What is "personal information"?

Personal information is information that the school holds about you and which identifies you. This includes information such as your name, date of birth and address, as well as things like bank and tax information. Closed Circuit TV (CCTV), photos and video recordings of you are also personal information.

## How and why does the school collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The school's primary reason for using your personal information is for documentation purposes and to comply with all legal obligations pertaining to employees.

- We obtain information about you from your CV, application, references, other application documents and personal documents. We may also save information from professionals such as doctors and from local authorities such as the police department in our files.
- We use CCTV at the front door for security reasons.
- We use the finger scanner for attendance and security reasons.
- We may take photographs or videos of you at school events to use on social media and on the school website. This is to show prospective parents and students what we do here and to advertise the school. We may continue to use these photographs and videos after you have left the school.
- We may publish sports team pictures and other news on the school website or in the Eagle.
- We may send you information to keep you up to date with what is happening at the school. We use both email and the school's weekly Eagle to provide information about events and activities (including fundraising events).
- We may use information about you if we need this for historical research purposes or for statistical purposes.
- We may need to share information with potential employers, such as providing references.
- All communication done on school equipment or using the school's technical infrastructure is monitored.

## Financial information

- We process financial information about you in relation to the payment of salary and taxes. In some cases we get information about you from third parties such as credit reference agencies, which is needed for the renewal of visas. The school as an employer helps processing the visas, but is not obliged to do the application, and all necessary steps, on behalf of staff members.

### **Sharing personal information with third parties**

- ICSV staff members receive a G-Suite Google Account. At the initial log-in they receive the Google Privacy Policy.
- In accordance with our legal obligations, we may share information with local authorities, (e.g. the *Stadtschulrat*/Department of Education, *MA 35*/Austrian Visas and Immigration, and the *AMS*/labor market service).
- ICSV uses numerous educational databases, apps, and websites. Your name and/or email address may be needed to access these tools.
- On occasion, we may need to share information with the police.
- We may also need to share information with our legal advisors for the purpose of obtaining legal advice.
- Occasionally we may use consultants, experts and other advisors to assist the school in fulfilling its obligations and to help run the school properly. We might need to share your information with them if this is relevant to their work.
- If you are not of Austrian nationality or do not hold citizenship in a European country, we might have to provide information about you to Austrian Visas and Immigration and the labor market service.
- We may share some information with our insurance company, for example, where there is a serious incident at the school.
- We may need to share information if there is an emergency, for example, if you are hurt while on school premises.
- We do not sell or rent your information to anyone.

## Legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your information.

### **Legitimate interests**

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The school relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the school has a legitimate interest in:

- Providing educational services to the students
- Safeguarding and promoting the welfare of the staff and students
- Promoting the objects and interests of the school (this includes fundraising)

- Facilitating the efficient operation of the school
- Ensuring that all relevant legal obligations of the school are complied with

If you object to us using your information where we are relying on our legitimate interests as explained above, please contact [hr@icsv.at](mailto:hr@icsv.at) or HR staff directly.

### **Necessary for a contract**

We need to use your information in order to perform our obligations under our contract with you. For example, we need your name, contact details, bank information, tax numbers, etc.

### **Legal obligation**

The school may need to use your information in order to comply with a legal obligation. We may also have to disclose your information to third parties such as the courts, the local authority, or the police where legally obliged to do so.

### **Consent**

The school relies on your consent for processing data. That means that you have given consent to the processing of your personal data for one or more specific purposes.

## **Sending information to other countries**

We may send your information to other countries where:

- we have to store information on computer servers based overseas; or
- we communicate with you when you are overseas (for example, during the summer vacation if you live in a different country)

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

If the country that we are sending your information to is not on the list or is not a country within the EEA (European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in Austria.

## **For how long do we keep your information?**

We will keep some information after you have left the school, for example, in order to verify your dates of employment. We as an employer are obligated to be able to issue an employment verification for 30 years; therefore, some of your information will be kept for 30 years.

In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under the data protection law.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes.

## Where we store your personal data

The majority of the personal data we collect will be stored and processed in Austria at our offices and in our data centre(s). We will only transfer data outside of the European Economic Area where it is necessary for us to do so.

We keep a soft copy (electronic) and a hard copy (print) of personal data. The latter is stored in a locked cabinet.

In order to allow staff and students to use the latest educational tools it is necessary to transfer some data to a US company, Google. We have undertaken a detailed assessment of this email provider and have concluded that they have good privacy safeguards and security features in place to prevent unauthorised access of data we send them.

### **Security of processing**

To ensure the integrity of data that we are processing locally we are using redundant storage devices that are physically only accessible by a limited number of ICSV employees; use digital restrictions to ensure that ICSV employees only have access to personal data that is required; and using industry standard anti-malware applications. Additional offsite backups are being encrypted with secure AES encryption before they get transferred outside our local datacenter. Every ICSV employee has to sign an agreement that states that no personal data should be transferred without proper authorisation.

### **Data Breach Notifications**

In the event of a security breach of Personal Staff Information or other confidential information, we notify everyone that is affected as soon as possible in accordance with applicable laws.

## Cookies

In order to provide the ICSV Website, we have placed cookies on the computer or other device of a user. Cookies are used to collect standard internet log information and visitor behavior information. This information is used to arrange the content of this website, ensure security, track visitor use of this website, and to compile statistical reports. These cookies are **not** used to target users of the ICSV website with online advertising. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Changes to this privacy policy

If we make any major changes to this Privacy Policy we will post details on our website and will notify our primary contact(s) at the school via email. This policy was reviewed and updated in May 2018.

## What decisions can you make about your information?

Beginning on May 25, 2018, you will be able to make various decisions about your information. Some of these are new rights, while others build on your existing rights. Your rights are as follows:

- If information is incorrect you can ask us to correct it;
- You can also ask what information we hold about you and be provided with a copy;

- You can ask us to delete the information that we hold about you in certain circumstances if we no longer need the information;
- You can ask us to send you or another organisation certain types of information about you in a format that can be read by computer;