



5/16/19

2019-2020 Privacy Notice with Essential Services For Parents and Students 14 and Over

Introduction

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

If you have any questions about this notice please contact office@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 exam results, medical details and behavior records. The school may also record your religion or ethnic group. 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 to provide educational services to you or your child.

- We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local authorities.
- We may have information about any family circumstances which might affect your child's welfare or happiness.
- We need to tell the appropriate teachers if your child is allergic to something or might need extra help with some tasks.
- We may need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other students at the school.
- We use CCTV at the front door for security reasons.
- Photos may be required for school records or identification purposes.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- 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.
- Depending on where your child will go when you leave us, we may need to provide your information to other schools, colleges and universities, or potential employers. For example, we may share information about your exam results and provide references.

- When your child takes examinations (e.g. ACT/SAT) we will need to share information about him/her with the exam company.
- We may monitor your child's use of email, the internet, and mobile electronic devices. This is to verify that your child is using technology as intended during school hours. If you would like more information about this please refer to the Parent-Student Handbook or contact office@icsv.at.
- We monitor student attendance and progress and generate progress reports, report cards, and transcripts.

Financial Information

- We process financial information about you in relation to the payment of fees. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s).

Sharing Personal Information with Third Parties

- Every ICSV student receives a G-Suite Google Account. At the initial log-in they receive the Google Privacy Policy. Emails are only active for students in grades four to twelve.
- In accordance with our legal obligations, we may share information with local authorities, (e.g. Department for Education).
- ICSV uses numerous educational databases, apps, and websites. Your child's 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.
- We are required to provide information about all of our students to the Stadtschulrat (Vienna School Board).
- We may share some information with our insurance company, for example, where there is a serious incident at the school.
- If you have unpaid fees while your child is at the School we may share information about this with other schools or educational establishments to which you intend to send your child.
- If your child leaves us to attend another school we may need to provide that school with information about you that is included in the student file.
- We may share information about you with others in your family, such as another parent or step-parent.
- 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

The school relies on legitimate interest for processing data. That means that processing is necessary for the purpose of the legitimate interests pursued by the school as controller or by a third party, except where

such interests are overridden by the interests or fundamental rights and the freedoms of the data subject which require protection of personal data.

Specifically, the school has a legitimate interest in:

- Providing educational services to your child;
- Safeguarding and promoting the welfare of your child (and other children);
- Promoting the objects and interests of the school. This includes fundraising. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid school fees are due;
- Facilitating the efficient operation of the school; and
- Ensuring that all relevant legal obligations of the school are complied with.

In addition, your personal information may be processed for the legitimate interests of others. For example another school will have a legitimate interest in knowing if you have not paid school fees that are due to us. If you object to us using your information where we are relying on our legitimate interests as explained above, please contact office@icsv.at or the office staff directly.

Necessary for a Contract

We will need to use your information in order to perform our obligations under our contract with you. That means that processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you for questions or concerns.

Legal Obligation

The school may need to use your information in order to comply with a legal obligation which the school is subject to, for example to report a concern about your wellbeing to Children's Services. 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 or your child 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

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the 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 keep your information for as long as we need to in order to educate and look after your child (99 years). We will keep some information after your child has left the school, for example, in order to provide a copy of a report or transcript.

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.

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 Student Information or other confidential information, we notify everyone that is affected as soon as possible in accordance with applicable laws.

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 in May 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 to provide your child with an education
- 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

Essential Service Providers and Applications

In order to offer students the latest educational tools we use third party service providers and applications. We currently use the following service providers and applications that are essential to our

ability to meet your child's needs as outlined in the Contract. The following information will be transferred and saved at those companies:

All School:

EdAdmin (Entimex Education Pty Ltd) and PowerSchool (PowerSchool Group LLC)

Students: Full Name, Admission Number, Age, Age Group, Born in, Cell/Handy Number, Class, Date of Birth, Debit Order, Email, Gender, Grade, House, ID/Passport, Keyword, Language most fluent, Level, Nationality, Other Languages, Place of Birth, Preferred Name, Religion, Sibling, Student Status, StudentID, Tutor Group, Educational History, Date Enrolled, Date of leaving, Date Starting Classes, Grade Enrolled In, Graduation Date, Last Day, Leaving Comments, Leaving Explanation, Prev. Grade, Reason For Leaving, State/Province, Transferring To School, Visa Expiry Date, Visa Number, ELL Support Service, Evacuation Permission, Insurance Name, LS Support, Personal Email, Photo, Policy Number, Potassium Permission, Publicity Permission, Social Security Number, Student Support Contract on File, Student Support Services, Visa Expiry Date, Visa Attachment

Guardians: Full Name, Cell/Handy Number, Email, Employer, Home/Work Phone, Language, Nationality, Profession, Relation, Title, Year Attended, Language at Home, Parental Status, Parent School ID Number, Emergency Contact information, Employer Address, Mailing Address, Residential Address, Salutation, Bank Account Name, Account Number, Bank Name, Branch Code, Branch Name, Bank Cell Number, Bank Fax Number

EdAdmin (Entimex Education Pty Ltd) and BMD (BMD Systemhaus GESMBH):

Students: Full Name, Admission Number, Age, Age Group, Born in, Cell/Handy Number, Class, Date of Birth, Debit Order, Email, Gender, Grade, House, ID/Passport, Keyword, Language most fluent, Level, Nationality, Other Languages, Place of Birth, Preferred Name, Religion, Sibling, Student Status, StudentID, Tutor Group, Educational History, Date Enrolled, Date of leaving, Date Starting Classes, Grade Enrolled In, Graduation Date, Last Day, Leaving Comments, Leaving Explanation, Prev. Grade, Reason For Leaving, State/Province, Transferring To School, Visa Expiry Date, Visa Number, ELL Support Service, Evacuation Permission, Insurance Name, LS Support, Personal Email, Photo, Policy Number, Potassium Permission, Publicity Permission, Social Security Number, Student Support Contract on File, Student Support Services, Visa Expiry Date, Visa Attachment

Guardians: Full Name, Cell/Handy Number, Email, Employer, Home/Work Phone, Language, Nationality, Profession, Relation, Title, Year Attended, Language at Home, Parental Status, Parent School ID Number, Emergency Contact information, Employer Address, Mailing Address, Residential Address, Salutation, Bank Account Name, Account Number, Bank Name, Branch Code, Branch Name, Bank Cell Number, Bank Fax Number

G Suite for Education (Google LLC):

Students: ICSV provides Google with: Last Name, First Name, Grade, Password and Assignments in Google Classroom.

Google may also collect personal information directly from students, such as telephone number for account recovery or a profile photo added to the G Suite for Education account. When a student uses Google services, Google also collects information based on the use of those services.

Using their G Suite for Education accounts, students may access and use the following Services offered by Google described at https://gsuite.google.com/terms/user_features.html:
Gmail (only for middle and high school students), Calendar, Classroom, Contacts, Drive, Docs,

Forms, Groups, Keep, Sheets, Sites, Slides, Hangouts (only for middle and high school students), Google Earth, Google Maps, Google Photos, Google Play, YouTube.

Google does not use any user personal information (or any information associated with a G Suite for Education Account) to target ads while using an G Suite for Education account.

NWEA Map testing (Northwest Evaluation Association) - Students in Grades 1 to 9:

Students: Full Name, Date of Birth, Grade, Student Identification Number, Assigned Classroom Teacher, Classification Data (which may, but does not always, include Race, Ethnicity, Gender, Nationality, Disability Status), RIT Score (Estimation of a Student's Instructional Level), Test Responses, Growth Projections.

Avalaris: School Phone System logs (not recordings but metadata, Phone Number)

Boom Learning (Omega Labs Inc.): Email, Account created/login timestamp, device type, app/browser version, student performance, time, Test answers

ClassLink (ClassLink Inc.): Full name, school building affiliation, grade level, email, timestamps of logins to classlink apps

Destiny (Follett School Solutions, Inc): First name, Last name, Email

FlipGrid (Flipgrid, Inc; Microsoft, Inc.): First Name, Last name, Email, Post content

Khanacademy.org: Students Grade 1-12: First name, Last name, Email, Date of Birth, Country, Information about your browser or device

MailChimp (Eagle): EMail address, Newsletter content

Profiportrait (Profiportrait Vertriebs GmbH): Full Name, Grade, Birthdate, Student ID, Email, District Code, School Photo.

quizizz.com (Quizizz Inc.): Students Grade 3-12: Username, Name, Age, Email, App interactions, Device identifying information, IP address

Screencastify (Screencastify, LLC.): Students Grade 3 - 12: First Name, Last Name, Email, Timestamp log of Videos created, Basic application usage data

Statistik Austria: Social security, Date of birth, Gender, Nationality, Languages spoken, District, Grades

Storybird (Storybird Corp.): Students Grade 2-12: Username, Email, Birthdate, Grade, School name

Elementary only:

ABC Mouse (Age of Learning Inc.): Students first name and last initial, Parent's email, Grade, Teacher's email

deeprootsbible.com (Defendable Faith Institute): Email, Username

Moby Max - www.mobymax.com: First Name, Last Name, Username, Grade, Browser, Device type

RAZ Kids (Lazel Inc.): First name, Last name, Parents emails (only if parent has requested access), Reading levels, Grade

Spelling City (VocabularySpellingCity): Elementary: Teacher's email

Splash Math (StudyPad Inc.): Elementary: First name, Last name, Parent's emails, Grade, Teacher's email

Typing Club: First name, Last name, Email, Typing progress

Typing.com (Teaching.com): Username, Password; optional: First name, Last name, Email

www.testen-und-foerdern.at (Österreichischer Bundesverlag Schulbuch GmbH & Co. KG): Students Grade 2 - 5: First Name, Last Name, Email, Date of Birth, Country

XtraMath: First name, Last name, Parent's emails, Grade, Teacher's email

Secondary only:

101.Careers (101.Careers Pte LTD): HS Students: First Name, Last Name, Email, Grade, Gender

Adobe: Used for free Adobe Creative Cloud edu license: Email, Date of Birth, Eligibility information

Blogger.com (Google LLC): (Spanish class HS students only)

BridgeU (BridgeU Ltd): Full Name, Email, Date of Birth

Canva.com (Canva, Pty Ltd): HS Students: Username, First name, Last name, Email, Date of Birth, Phone number, Profession, analytics data

Collegeboard (AP/SAT): Secondary: Name, Address, Date of birth, Gender, Social security number or student ID, Address. We may also ask for phone numbers and email addresses, school name, grade level or expected graduation date, ethnicity, and a parent's name, email address, and education level.

Dbqproject.com (The DBQ Project): First Name, Last Name, Email

Office 356 (Microsoft inc.): Used for Microsoft Office Education License: First name, Last name, Email

Pear Deck (Deck, Inc): First Name, Last Name, Email, Device information

Teachtci.com (Teachers' Curriculum Institute): HS Students: First initial, Last Name, Username, Password

Vocabulary.com (Thinkmap, Inc.): Nickname, First Name, Last Name, Email, School affiliation, Grade, Points & Achievements, Learning History, Answers to Questions

Wakelet.com (Wakelet Ltd): Username, Email, Public Data

IB only:

ManageBac (ManageBac LLC): **Students:** Full Name, Student ID, Email, Date of Birth, Grade;
Parents/Guardians: Full Name, Email

SLS and ELL only:

Co-Writer (Don Johnston Inc.): Email, Google Sign in identifier, Option settings, Saved Text

Snap and Read (Don Johnston Inc.): Email, Google Sign in identifier, Option settings, Translated Text, Text spoken with Online text to speech tool, Saved Text,

Bookshare (Beneficent Technology, Inc): Username, Email

Other:

The following is a listing of third party services which may be used in certain situations depending on grade level and specific classes:

Bitmoji (Snap Inc.): Username, Password, Email, Phone number, Date of birth

Classdojo.com (Class Twist Inc.): First name, Last name, Age

Classzone.com (Houghton Mifflin Harcourt): First name, Last name, Email address, Username and other information which may include gender, race, and ethnicity

Code.org: Mandatory: Display name, age, Login time, IP address, and other technical data; Optional: hash of email address, parent email address, gender, race, Data collected by Student-created apps, Written comments in response to curricular/educational prompts within Code.org courses, Student-provided responses to surveys (e.g. multiple choice and free response questions); Automatic: Progress in the course, Student projects - apps, animations, stories, or code-art, Student-uploaded images, sounds, or videos (for App Lab, Game Lab, and Web Lab Projects)

Codecademy.com (Ryzac Inc.): username, password, email address

David.school: Name, contact information, gender, date of birth, occupation

Desmos.com: Name, email address, data through google login

Edcite.com: Name, email address, username, password

education.com: Name, email address, job title, phone number, school or organization name, account type, payment type

Education.ti.com (Texas Instruments Inc.): Email address

EDpuzzle: Unique username, unique email, a password, their first name, last name and a unique code they have been given by their teacher to connect to a class

Kahoot: Name, email address, Date of birth, School, Biographical information, username, password, Profile picture, your interests

Kognity: We only have access to/collect information that you voluntarily give us via email, by filling in information on this site, or through other direct contact from you

Mangahigh.com (Blue Duck Education Ltd.): first name, last name, class, username and password

My.hrw.com (Houghton Mifflin Harcourt): first and last name, email address, username and other information which may include gender, race, and ethnicity

Newsela: Name, classroom affiliation, username, password

Padlet.com (Wallwisher Inc.): username, password, email address

Pamoja (Pamoja Education Ltd.): Username, Password, Email, Any information that you provided by filling in forms on pamojaeducation.com

Pearson Realize, Pearson SuccessNet: First name, Last name, Email, School name, Grade

Prodigygame (SMARTeacher Inc.): First name, Last name initial, Password, Country, Grade, Parent Email

Questiaschool (Cengage Inc.): Email, Username, First name, Last name, Password

Quizlet: Email

Scratch.mit.edu (Lifelong Kindergarten Group at MIT Media Lab): Email, Username, Country, Birthdate, Gender

Seesaw (Seesaw Learning Inc.): Name, email address, password, profile picture, phone number, photographs

Socrative (MasteryConnect Inc.): Name, student assessment responses and other evidence of learning, email address, username, password

Sumdog: First name, last name, email address, password, school name, address, grade level, school year, class

Transum.org: Name, address, email address, phone number

Turnitin (iParadigms LLC): Name, email address, phone, job title, school

Voxer (VoxerNet LLC): Name, email address, user name, password, phone number, other registration information

Whatsapp (Facebook inc.): Name, Phone Number