

International School of Estonia

(MTÜ International Educational Association of
Estonia)

Privacy Policy

Effective date	Approved by	Director's order #
22.05.2025	Joseph Levno, Director	2025-05-22-1



1. Personal data controller's identity and contact

The International School of Estonia ("ISE") is the responsible personal data controller for the personal data processing managed by ISE and determines the purposes and means by which personal data is used and processed at ISE. ISE takes personal data protection very seriously and recognizes the importance of protecting the privacy and security of your personal information. Please read this Privacy Policy carefully in order to understand how we process your personal data.

Data subject in the context of this Privacy Policy means an identified or identifiable person.

Personal data in the context of this Privacy Policy means any information related to a data subject that can be used to directly or indirectly identify the person, for example, a name, an e-mail or a contact address.

Processing in the context of this Privacy Policy means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Processor in the context of this Privacy Policy means a natural or legal person, public authority or another body which processes personal data on behalf of the controller.

The Controller of personal data processing is INTERNATIONAL EDUCATIONAL ASSOCIATION OF ESTONIA MTÜ (registry no. 80074691).

In case you should have any further questions regarding the personal data processing carried out by ISE, please feel free to contact us via e-mail dpo@ise.edu.ee or the following address:

International School of Estonia
Juhkentali 18
10132 Tallinn
Estonia



2. Principles of personal data processing at ISE

ISE processes your personal data subject to the principles laid down in this Privacy Policy.

Transparency

ISE cares about your privacy and protection of personal data. Therefore ISE processes your personal data in a fair and transparent manner and only when we are allowed to do so according to the law.

Purpose limitation

ISE collects your personal data for specified, explicit and legitimate purposes. We will not further process your personal data in a manner that is incompatible with the initial purposes. When processing your personal data for a purpose other than the initial purpose, we rely on the legal bases originating from the law or we ask for your approval to process your personal data for other purposes.

Data minimization

ISE is doing its best to ensure that personal data processed by ISE is adequate, relevant and limited to what is necessary in relation to the purposes for which personal data are processed. We aim to not process any redundant personal information.

Accuracy

Our aim in ISE is to ensure that personal data shall be accurate and kept up to date where necessary. ISE shall take every reasonable step to ensure that inaccurate personal data will be erased or corrected without delay. If the personal data should prove to be false, ISE also gives you the possibility to correct and/or delete it. For instance, if your contact information has changed, you can easily send us the update and ISE will make the necessary changes in the documentation at the earliest possible time.

We kindly rely on your cooperation when we sometimes ask you to update your personal data as well.

Storage limitation

ISE keeps your personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. ISE processes personal data (on paper, electronically and other) as long as it is required by applicable laws, binding contracts (e.g. ISE Pre-School and School Study Agreements) or binding legal obligations.



For example, ISE stores the accounting source documents for seven years as of the end of the financial year according to Estonian Accounting Act § 12 and CCTV (video surveillance) recordings at ISE are retained for 98 days as allowed by Estonian Security Act.

Integrity and confidentiality

ISE processes your personal data in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing. ISE will take all reasonable measures in its power against accidental data loss, destruction or damage. ISE uses different technical and organizational measures to enhance security when processing personal data. For raising awareness and knowledge about personal data protection at ISE, privacy training is organized for ISE personnel who process your personal data. In addition, members of ISE personnel are bound by the obligation of confidentiality and we do everything in our power to keep your personal data safe. ISE personnel may access and use personal data only if they are authorized to do so and only in compliance with this Privacy Policy. Unless permitted or required by law, ISE will not disclose any personal data to third parties without prior written consent.

ISE normally does not process special categories of personal data (sensitive data such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning health etc). However, members of ISE personnel might process data concerning health when we need to find out why the child or student is absent from school and/or to provide special attention to the specific student at the school.

Data protection by design and by default

ISE takes into account the principles of *data protection by design and by default* and data subject's right to personal data protection. ISE implements measures which meet in particular the principles of data protection by design and data protection by default. Such measures consist of e.g. transparency with regard to the functions and processing of personal data, enabling you to monitor the data processing and minimizing the processing of personal data.



3. Categories of personal data

For carrying out study-related and study-supporting activities, ISE needs to process the personal data of children, students, students' parents or legal guardians.

The categories of personal data ISE processes are:

Student data which may be a name, gender, date of birth, contact details, the ID code and number, nationality and citizenship, previous education and learning outcomes data, languages spoken, admission information, arrival/departure information, other personal information the child or student has disclosed to ISE. But also sensitive data in relation to health, e.g. allergies, need for medication, special medical condition, and psychological assessment.

A parent or legal guardian data which may be the name and personal details, contact details, relationship to student, occupation, and place of employment, family data, other personal information the parent or legal guardian has disclosed to ISE.

Representatives of service providers' data which may be a name; contact details, data stored on security camera recordings.

Visitors' data which may be a name, time and date of the visit and data stored on security camera recordings.

4. Purposes for personal data processing

Data processing purposes differ depending on the data subject in question.

Personal data of students and parents or legal guardians is processed for following purposes:

- Student admission purposes;
- Organization and administration of learning, e.g. Organizing and carrying out study-related field trips, enabling parents or legal guardians to participate in study-related activities;
- Ensuring safety and the wellbeing of children, students, staff and parents or legal guardians;
- Fulfilling Pre-School and School Study Agreements;
- Providing school nurse services and school psychologist services, including to lay down an individual learning plan, where necessary;



- Fulfilling legal obligations and, when necessary, for the establishment, exercise or defense of legal claims;

Personal data of representatives of service providers is processed for following purposes:

- Fulfilling contracts concluded between service providers and ISE;
- Ensuring safety and wellbeing of children, students, staff and parents or legal guardians.

Personal data of visitors is processed for following purposes:

- Ensuring safety and wellbeing of children, students, staff and parents or legal guardians.

5. Legal bases for the processing of personal data

ISE relies on following legal bases for the processing of personal data:

Contract

ISE processes personal data of students, parents or legal guardians and representatives of service providers to fulfill Study agreements and service contracts. ISE also relies on this legal basis in pre-contractual relationships in order to conclude contracts between ISE and aforementioned persons.

Legal obligation

ISE processes personal data of students, parents or legal guardians and representatives of service providers to comply with legal obligations. For example, retaining accounting documents for seven years.

Legitimate interest

ISE processes personal data of students, parents or legal guardians, representatives of service providers and visitors to pursue legitimate interests of ISE. For example, collecting visitors' names and using security cameras. The main legitimate interest pursued by ISE in the context of this Privacy Policy is ensuring safety in ISE.

Consent



ISE processes personal data of students, parents or legal guardians relying on consent when carrying out additional activities. For example, promoting ISE in social media.

Vital interest

ISE processes personal data of students, parents or legal guardians, representatives of service providers and visitors to protect vital interests of aforementioned persons. For example, in a case of a medical emergency.

6. Personal data retention periods

ISE retains personal data for no longer than is required to fulfill the purpose (or any directly related purpose) for which the personal data is processed. For example, data subject withdraws a consent, which is the only legal basis for processing personal data for that purpose.

The retention periods are set using following criteria:

- Personal data will be stored for as long as it is necessary for the purpose of fulfilling Study agreements and service contracts.
- Personal data retention is necessary to comply with legal obligations. For example, storing security camera recordings.
- Personal data will be stored for a limitation period for the establishment, exercise or defense of legal claims.

7. Processors and third party access to personal data

As a general rule, ISE do not disclose personal data to third parties, except in limited cases which are described below or necessary for fulfilling the purposes of processing described in this Privacy Policy.

- ISE may disclose personal data to reputable service providers used for personal data processing (processors). For example, accounting software providers or online study platform operators. All the processors are located in the EU/EEA.
- ISE discloses personal data to public authorities to comply with legal obligations. For example, tax authorities or data protection authorities.



- ISE may disclose personal data to professional consultants. For example, professional auditors or lawyers.

8. Data Subjects rights

Respecting data subject's (identified or identifiable natural person) rights is of importance to ISE and therefore handled with special attention. When requested by the data subject, the information about that specific data subject may be provided electronically, in writing or orally by ISE, taking into account that the identity of the data subject is clear and proven.

This means that, when looking through your data subject request and in case of doubt, ISE may ask for additional information to be provided by you to enable data subject identification. We do this to be absolutely sure about the data subject's identity and to ascertain that we provide the correct information to the right person.

We aim to answer your request as soon as possible, but not later than one month of receipt of the request. With more complex requests, we might need to extend the answering period by two further months. In the latter case, we will inform you about the extension of the answering period and explain to you the reasons.

Your rights as a data subject are following:

Right of access by the data subject – you have the right to access your personal data which is processed by ISE. This enables you to be aware and verify which type of personal data and how ISE processes about you. You can also turn to ISE and ask for which purposes we process your personal data if it remains unclear to you or you would like to ask additional questions from us.

Copies – ISE will provide a copy of your personal data upon your request free of charge when you need it. For any further copies requested, ISE may charge a fee based on actual costs if the requests from a data subject are of repetitive character. Where you make the request by electronic means, and unless you otherwise request it, the information by ISE will be provided in a commonly used electronic form. ISE may refuse to disclose the data in a copy entirely or refuse to provide a copy when this disproportionately affects the rights and freedoms of other data subjects besides you and less strict measures cannot be taken.

Right to rectification – every data subject who notices that his/her personal data is not up-to-date, false or needs to be corrected can turn to ISE and have this data



rectified and corrected. You can also have your incomplete personal data completed. ISE will make sure this personal data will be corrected as soon as possible.

Right to erasure (“right to be forgotten”) – this right allows data subjects to have their personal data erased, except in a case ISE has a legal right to process the data (e.g. legal obligation to retain the data).

Where ISE has made the personal data public and is obligated to erase the personal data, ISE, taking into account the available technology and the cost of implementation, will take reasonable steps, including technical measures, to inform other processors which process the personal data that the data subject has requested the erasure of any links to, or copy or replication of, those personal data.

Right to erasure is not an absolute right and therefore your request to have your personal data erased may not mean that it is 100% guaranteed that your data will be erased after the request. Sometimes we are obligated by law to retain some data and in cases like this we might not be able to satisfy your request for erasure. This can also be the case when we need to retain this data for the exercise or defence of legal claims.

Right to restriction of processing - when requested by a data subject and under certain circumstances, ISE restricts the processing of your personal data for a certain period (e.g. until accuracy of personal data is verified). Right to claim restriction is permitted in cases such as, if the processing is unlawful, personal data is not accurate and right to rectification is exercised, controller no longer needs the personal data or data subject has submitted an objection.

As a result of that, ISE may be permitted to only store the existing personal data but not further process it. ISE restricts the processing of your personal data upon your request until the verification of accuracy or when you contest the accuracy of your personal data. ISE may also be obligated to restrict the processing of personal data, for example, when ISE no longer needs it, but you require the data to establish, exercise or defend a legal claim. ISE will inform you if the restriction of processing is lifted.

Right to data portability – you may use the right to receive the personal data concerning you, which you have provided ISE, in a structured, commonly used and machine-readable format. In exercising this right, you may use the right to have



your personal data transmitted directly from one data controller to another (e.g. from one school to another), where it is technically feasible.

Right to object – you have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you if it is based on legitimate interest. In that case, ISE will no longer process the personal data unless ISE demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject (or for the establishment, exercise or defence of legal claims).

The right to lodge a complaint with a supervisory authority – every data subject has the right to turn to a data protection supervisory authority with a complaint if the data subject considers that the processing of personal data relating to him or her infringes and is not in accordance with provisions foreseen by the data protection laws and the GDPR. The national supervisory authority in Estonia is Andmekaitse Inspektsioon (info@aki.ee, www.aki.ee, Tatari 39, Tallinn 10134).

The right to withdraw consent – if the personal data processing is based on consent (in addition to the main study activities at ISE), the data subject has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. ISE will stop processing personal data if the sole basis for the processing is consent. If there exist(s) other legal ground(s) for personal data processing (e.g. contract, legitimate interest) the processing may be continued based on this other legal ground.

9. Safeguards

ISE keeps all personal data revealed to it strictly confidential and protects personal data from illegitimately falling into the hands of third parties.

ISE uses safeguards which take into account the nature, scope, context, and purposes of the processing and the risk to the rights and freedoms of natural persons. These measures include inter alia appropriate IT, technical and organizational data protection measures. Such measures are put in place to ensure that by default personal data are not made accessible to an indefinite number of persons where there is no will for that and to ensure personal data



protection in general. When using CCTV, ISE displays informative signs, which are visible and readable to data subjects.

10. Implementing provision

Taking into account possible changes in legislation, case law and developments in the practices of technologies ensuring a high level of personal data protection, ISE reserves the right to make changes to this Privacy Policy. Therefore this Privacy Policy is subject to a periodical review and possible changes where necessary.

ISE will be responsible for the compliance with personal data protection principles set out in this Privacy Policy before data subjects. At the same time we do everything we can to reduce the personal data protection risks to a minimum level and keep your personal data safe.

