



ST GEORGE'S
DIOCESAN SCHOOL
— *Credo ut Intellegam* —

ST GEORGE'S DIOCESAN SCHOOL

DATA PROTECTION POLICY

Please note that **Namibia** is a non-European country where there are currently no **data protection** laws in accordance with GDPR 2016/679 and there is no adequate level of **data protection** recognized by the European Commission. However, **St George's Diocesan School** agrees to comply with the **privacy policy** in accordance with GDPR 2016/679.

1. Scope of this policy

This policy sets out how St George's Diocesan School manages its data protection responsibilities towards staff and members of the public. The School website, www.stgeorgesnamibia.com is hosted by wix.com. St George's School has made the necessary preparations to ensure that the School website is compliant with the EU General Data Protection Regulation (GDPR). Any personal information that you submit to us through the contact forms on our website, is stored on the wix.com server, and therefore protected in accordance with the GDPR.

2. Information covered in this policy

The following terms are defined in the provisions of GDPR 2016/679, which we use in our privacy policy (according to the original text of the basic regulation):

Personal data means any information relating to an identified or identifiable natural person ("data subject"); a natural person is regarded as identifiable, which can be identified directly or indirectly, in particular by association with an identifier such as a name, with an identification number, with location data, with an online identifier or with one or more special features.

Processing of any automated process or process in connection with personal data such as collecting, organizing, storing, adapting or modifying, reading, querying, using, disclosing by transmission, distribution or any other form of provision, reconciliation or linking, restriction, erasure or destruction;

Restriction of processing means the marking of personal data stored in order to limit its future processing;

Profiling means any kind of automated processing of personal data which consists in the use of personal data to evaluate certain personal aspects, in particular aspects of work performance, economic situation, health, personal preferences, interests, reliability, behavior, location or change of location of this natural person to analyse or predict;

Consent of the data subject to any expression of will, in an informed and unambiguous manner, in the form of a statement or other unambiguous confirmatory act by which the data subject expresses his understanding of the processing of the personal data concerning him agrees;

Pseudonymisation means the processing of personal data in such a way that personal data can no longer be attributed to a specific data subject without the need for additional information, provided that such additional information is kept separate and subject to technical and organizational measures

Controller means the natural or legal person who, alone or in consent with others, decides on the purposes and means of processing personal data;

Processor means a natural or legal person, public authority, body or body that processes personal data on behalf of the controller;

Recipient means a natural or legal person, public authority, agency or other entity to whom personal data are disclosed, whether or not it is a third party.

Third party means a natural or legal person, public authority, body or body other than the data subject, the controller, the processor and the persons authorized under the direct responsibility of the controller or processor to process the personal data.

3. Staff duties

All St George's employees are expected to:

- acquaint themselves with, and abide by, the Data Protection Principles;
- read and understand this policy document;
- understand what is meant by 'personal' and 'special category' data, and know how to handle such data;
- contact the Executive Head if a breach of security is suspected.

4. Fair and Lawful

- 4.1. St George's School processes personal data fairly and lawfully.
- 4.2. St George's School only collects personal data when it has legitimate interest as a basis for collecting and using the personal data, such as (but not limited to) supporting school activity, student participation in RSIS/RSIC, enquiries via the website, conference online application, general school applications.
- 4.3. At the point of the Data Subject submitting the data, St George's School is transparent about how it intends to use the data, and provides individuals with appropriate privacy notices when collecting their personal data.
- 4.4. St George's School does not use data in ways that have unjustified adverse effects on the individuals concerned and does not do anything unlawful with the data.
- 4.5. The St George's School IT Manager conducts data impact assessments in respect of activities that require the collection of personal data directly from individuals at the point of registration for school projects, RS service projects and conferences. These are documented on a spreadsheet and reviewed as part of the event management processes.
- 4.6. When the Data Subject is being asked for consent, St George's School does not use pre-ticked boxes, or any other type of consent by default. Instead consent requests use clear, plain language that is easy to understand. St George's School makes it easy for data subjects to withdraw their consent if they wish to do so and has procedures in place to ensure their wishes are complied with.

5. Purposes

- 5.1. St George's School only collects personal/special category data in line with two specified lawful purposes and this data is not further processed in any manner incompatible with those purposes, which are:
 - 5.1.1. Contact via Inquiry Form: The necessary data is collected and processed accordingly.
 - 5.1.2. Conference Registration: where the data subject has given consent to the processing of his or her personal data for one or more specific purposes (registration for service project or conference participation).
 - 5.1.3. Contact Us: If you use the possibility to send messages via the "contact us", this data, which you have voluntarily entered, will be passed on to our admin staff so that they can respond to your request.
- 5.2. St George's School endeavours to be clear about the purpose or purposes for which personal/special category data has been collected at the point of collection from the Data Subject.
- 5.3. A collection, storage and further processing by Gondwana beyond the processing of your requests does not occur.

6. Adequacy

- 6.1. Personal data collected by St George's School shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.
- 6.2. Where special category data is concerned, St George's School recognises that it is particularly important to make sure only the minimum amount of information is collected or retained.

7. Accuracy

- 7.1. St George's School intends that personal data gathered shall be accurate and, where necessary, kept up to date.
- 7.2. St George's School takes reasonable steps to ensure the accuracy of any personal data.

8. Retention

- 8.1. Personal data processed for any purpose or purposes by St George's School shall not be kept for longer than is necessary for that purpose or those purposes.
- 8.2. 8.3 After the data expires it is securely disposed of.

9. Rights

- 9.1. Round Square recognises that all personal data shall be processed in accordance with the rights of Data Subjects under the GDPR and the Data Protection Act 2018 and that the Data Subject has:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

10.Security

10.1. St George's School takes all reasonable precautions to keep all personal information as secure as possible. In addition to a rigorously enforced data handling policy, all St George's staff members are made aware of their obligations to keep the information for authorised use only. Of course, no technology is fail-safe, but St George's School makes every effort to keep its systems up-to-date with the relevant protocols.

10.2. St George's School website data is stored in the USA and is backed up every 24 hours.

11.Future Policy & Data Protection Bill

Currently a Data Protection Policy for Namibia is being drafted. This policy will be developed in conjunction with the establishment of a Data Protection Authority. A new Data Protection Bill will give affect to the major aspects of the policy.