



Data Protection Policy

Policy No: WPSD Data Protection Policy
Owner: WPSD-LLC
Document Author: Principal
Authorised to Edit/ Amend: Senior Management
Authorised to Access: All stakeholders

Date of Compilation: October 2019
Version No: Ver: 3
Policy Reviewed in April 2020, April 2021, April 2022, April 2023 and April 2024
Policy to be reviewed again in April 2025

School Vision:

Our vision is for all students to develop at Woodlem Park School as independent learners with self-belief and respect for others with a lifelong love for learning and a strong foundation for future success.

School Mission:

At Woodlem Park School we value every student. We work together as a community to ensure that students develop well in all aspects of learning so that they are equipped to face the opportunities and challenges of the 21st century wherever they may be.

To Do This:

We provide the best possible learning opportunities in academic subjects, personal development, moral values, and life skills. Staff members and students work together in a spirit of cooperation and mutual harmony.

Aim, Scope and Significance

At Woodlem Park School Dubai, we recognize the importance of data protection and respect individuals' rights regarding the personal data we handle. In the course of our business activities, we collect, store, and process personal data. We strive to treat this data in accordance with legal safeguards and maintain the high standards expected from our organization.

All staff members are required to comply with this Data Protection Policy when processing personal data as part of their roles. Failure to adhere to this policy may result in disciplinary action. The Senior Leadership Team is responsible for ensuring compliance with this policy within their respective areas of responsibility. This policy ensures that personal information is handled correctly and securely, in compliance with UAE Law (e.g., UAE Penal Code, Article 379)

Article 379 of the UAE Penal Code states that it is a criminal offense for an individual to use a third party's information without consent for personal or another's advantage when that information was obtained through the individual's profession, craft, or art.

This policy applies to all information regardless of how it is collected, used, recorded, stored, or destroyed, and whether it is held in paper files or electronically. All staff involved in the collection, processing, and disclosure of personal data must be aware of their duties and responsibilities by adhering to these guidelines.

This Data Protection Policy applies to all personal data we process about our current, past, and prospective students (and their parents/carers), our current and past staff members, our suppliers, and any third parties we communicate with. It outlines how we will process personal data.



Data Protection Terms

For the purposes of this policy, the following terms are defined:

Data Controller: The organization that determines the purposes for processing Personal Data and the manner in which that processing will be carried out. In most cases, the school acts as the Data Controller of the Personal Data it collects and uses in its business activities.

Data Processor: The organization or person that processes Personal Data on our behalf and according to our instructions, such as suppliers and contractors. Our staff members are not considered Data Processors.

Data Subjects: All individuals about whom we hold Personal Data.

Personal Data: Any information relating to an individual who can be identified from that information or from any other information we may hold. Personal Data can include names, identification numbers, addresses (including IP addresses), dates of birth, financial or salary details, educational background, job titles, and images. It can also include opinions about an individual, their actions, or their behavior. Personal Data may be held on paper, in a computer, or on any other media, whether owned by the organization or on a personal device.

Processing: Any activity performed on Personal Data or Special Category Data. This includes the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, restriction, erasure, or destruction of data.

Special Categories of Personal Data: More sensitive information, including details revealing an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. This category also includes data concerning health (physical and/or mental), and genetic and biometric information used to uniquely identify a person. Data related to criminal convictions or related proceedings is also treated as special category data.

Responsibilities and Principles of Data Protection

Lawfulness, Fairness & Transparency

Personal data must be processed lawfully, fairly, and transparently. The Woodlem Park School Dubai will ensure that all processing activities adhere to lawful bases such as consent, contractual necessity, legal obligations, vital interests, public interest, or legitimate interests. We will communicate clearly with individuals about why their data is collected, how it is used, and the legal basis for its processing through privacy notices.

Purpose Limitation

Personal data should only be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes. WPSD will ensure that all personal data is processed only for the purposes specified in our Record of Processing Activity and Privacy Notices, unless there is a legal basis for further processing.

Data Minimisation

Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed. We will collect only the necessary personal data to fulfill our specific purposes, ensuring that there is a clear link between the data collected and the intended use.



Accuracy

Personal data shall be accurate and kept up to date; steps will be taken to rectify inaccurate data without delay. WPSD will maintain processes to ensure the accuracy of personal data and promptly correct any inaccuracies brought to our attention by individuals.

Storage Limitation

Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed. We will retain personal data only as long as necessary and securely dispose of data when it is no longer needed.

Integrity and Confidentiality

Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage. WPSD will implement organizational and technical measures to safeguard personal data, ensuring confidentiality, integrity, and availability.

Data Subject Rights

WPSD recognizes and respects data subjects' rights, including the right of access, right to rectification, right to erasure, right to object, and rights related to automated decision-making. Requests will be handled promptly and in compliance with our Information Rights Policy.

Sharing and Transferring Personal Data

Personal data will only be transferred to processors with adequate data protection guarantees and under contractual obligations. Data sharing with other controllers will be governed by Data Sharing Agreements where appropriate.

Data Retention and Disposal

WPSD will retain personal data no longer than necessary. Personal and special category data will be disposed of securely to protect data subjects' privacy.

Dealing with Data Protection Incidents

In the event of a data breach, WPSD will promptly assess and mitigate risks, notify affected individuals if necessary, and comply with legal obligations.

Use of CCTV

WPSD uses CCTV in accordance with the Video Surveillance Policy to ensure appropriate handling of collected images.

Policy Review

This Data Protection Policy will be reviewed annually to ensure ongoing compliance with legal requirements and best practices.

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