

Privacy Notice for Staff The International School of Lyon

Drafted 11/07/18 Edited 09/07/19

Privacy notice for staff

Under new European Union (EU) General Data Protection Regulations (GDPR) you have the right to be informed how The International School of Lyon (ISL) uses any personal data we hold about you. In compliance with this law, all individuals whose data we process will be provided with a privacy notice.

Under the terms laid down by GDPR, ISL is a "data controller" as we determine the purpose of and means by which your data is processed.

Our GDPR lead is Ms D Philip (See contact details below)

The personal data we hold

We process data concerning our employees and individuals who volunteer at the school. The data that we collect, store and process includes but is not restricted to:

This information includes:

- Your contact details
- Date of birth, marital status and sex
- Emergency contact details and next of kin
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, social security and tax office information
- Recruitment information, references, CV, Application letter, passport, work permits
- Qualifications and employment records, contract, working hours, training records
- Performance information
- Outcomes of disciplinary and/or grievance procedures
- Absence data
- Photographs
- CCTV images
- Data about your use of school information and communication systems

We may also collect, store and use Special Content Personal Data (SCPD). This contains more sensitive information about you (bold applies to all staff). Where appropriate this may include information about:

- Race, ethnicity, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records.

Why we use this data

We use this data to help ISL run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment
- Enable disability monitoring
- Track the performance of ISL
- Fulfil our legal responsibilities as an employer

Our Legal Basis for using this data

We only collect data GDPR allows us to. We will use your information where:

- Fulfil a contract we have entered into with you
- We need to comply with legal obligations
- It is our duty in the public interest

Sometimes, we may also use your personal data where:

- You have given us permission to use it in a certain way
- We need to protect your interests or the interests of others.
- We have a legitimate interest in processing this data

Where you have given us the authorization to use your personal data, you may withdraw this at any time. When we ask for permission, we will also make it clear how this permission can be withdrawn.

Collecting this information

How we store this data

Each employee has their own employment file which stored securely in the Private Safe Files access is highly restricted. Other data is stored on site in secure locations around the school, including password protected, restricted access servers. Some data is held on 3rd party, secure, encrypted, ISL dedicated GDPR compliant websites.

We keep personal data about you while you are at this school and for legal purposes, we will hold this data after you have left. All data we hold has a retention schedule applied and is regularly reviewed, archived or deleted.

Data Sharing

We do not share personal information about you with anyone outside the school with permission from you unless the law or our policies permit it.

Where it is legally required, or necessary under data protection law, we may share personal about you with:

- Your family or representatives
- Examining bodies
- Our regulator (IBO)
- Suppliers and service providers so they can provide services we have contracted them for
- Financial organisations
- Regional and national government organisations
- Our auditors
- Survey and research authorities
- Health authorities
- Health and social welfare organisations
- Security organisations
- Police forces, courts, tribunals
- Professional advisors and consultants

Your Rights

How to access personal information about you

As a "data subject" you may make an application to the school to see the data we hold about you and obtain an explanation of how we use it.

If we hold information about you, we will:

- Give you a description of it
- Tell you why we are holding it, and how long we are keeping it for
- Explain how we got it, if not from you
- Tell you who it has been shared with, or who it will be shared with
- Let you know if we are using the data to make any automated decisions (decisions being made by a computer or machine, rather than a person)
- Give you a copy of the information

You may ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please contact our GDPR lead.

Your rights over this data

You have rights over how your data is used an kept safe, including the right to:

- Say that you don't want it to be used if this would cause you, or is causing harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it.
- Claim compensation if the data protection rules are broken and it harms you in some way

Complaints

We take any complaints about our collection and use of personal data very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this issue with us in the first instance.

To make a complaint in France contact the COMMISSION NATIONALE DE L'INFORMATIQUE ET DES LIBERTÉS (CNIL):

Report a concern online at https://www.cnil.fr/fr/plaintes
Call 01 53 73 22 22

Or write to: COMMISSION NATIONALE DE L'INFORMATIQUE ET DES LIBERTÉS, 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07

Contact us:

If you have any questions or concerns or would like more information about anything raised in this privacy notice please contact our **GDPR Lead**:

• Ms D Philip Email: info@islyon.org