

**Important Information about the Use of Your Personal Data
by Schule Schloss Salem**

Dear Ladies and Gentlemen,

The European Union's Data Protection Regulations (GDPR) now in effect significantly strengthen the protection of personal data of individuals in the European Union. As a school and a boarding school we have always placed great value on the secure handling of your personal data.

The GDPR is the first uniform set of rules for data protection which apply throughout the EU. It provides a standardised basis for all EU members states and takes into account the latest aspects of information technology. As such it raises the level of data security in EU member states. In this way it strengthens the rights of individuals while at the same time increasing the obligations of institutions.

We are aware that diligence and transparency are the basis for a trustful relationship with you.

Further information about the specific handling of your personal data will be found in the attached Data Protection Notice. There you will also find contact details should you have further questions or need to contact us at any time.

With kind regards,

Schule Schloss Salem gGmbH

Enclosure:

Data Protection Notice in compliance with the EU General Data Protection Regulation (EU GDPR)

Data Protection Notice Pursuant to the EU General Data Protection Regulation

This Data Protection Notice applies to the processing of personal data by Schule Schloss Salem. Personal data means any information relating to an identified or identifiable natural person, such as names, addresses, telephone numbers, email addresses.

1. Who is responsible for data processing and who is my point of contact?

Responsible Authority:

Schule Schloss Salem gGmbH
Directors: Mr Henrik Fass, Mr Thomas Obitz
Schlossbezirk 1
D-88682 Salem
Tel.: +49 7553 919-0
E-Mail: info[at]schule-schloss-salem[dot]de

Data Protection Officer:

Mr Gaulocher
E-Mail: datenschutz[at]schule-schloss-salem[dot]de

2. Why does the school process data (purpose) and what is the legal basis for doing so?

The school processes personal data which is offered and provided by you within the scope of our business relationship. Moreover, we process personal data which has been legitimately obtained from publicly accessible sources and is allowed to be used.

Relevant personal data that is used to provide informational materials, to organise taster days, and to prepare and fulfil enrolment contracts or fixed-term contracts (e.g. summer school programmes) may include: names (students, legal guardians); address and other contact information (incl. telephone numbers, email addresses); date of birth, place of birth; citizenship; religious affiliation; school year; address of current school; parents' professions; siblings; personal information (incl. matters of health, life circumstances, family status); photo; certificates of schooling; curriculum vitae; parental questionnaire.

Within the scope of the following procedures further personal data in addition to the aforementioned data may also be processed and stored. Primarily these include:

Scholarship Applications: Data to evaluate the eligibility for participation and pre-selection in terms of need for a possible scholarship (income and financial status, in particular by means of income tax statements). In case of eligibility these data will continue to be used in order to determine the amount of the contractually binding school and boarding fees and the amount of the scholarship.

Provision of Donation Receipts: Data to enable us to fulfil contractual and legal obligations. Data regarding the response to requests for donations.

Client Contact Information: In establishing communication and during a schooling and boarding relationship, in particular through personal meetings, telephone conversations, or written correspondence -- whether initiated by you, by an intermediary agency, or by the school -- further personal data may be gathered, such as

information about the channel of communication, occasion and result of communication, (digital) copies of correspondence, as well as information about participation in direct marketing procedures.

Newsletter Distribution: The purpose of distributing our newsletter is to inform recipients about Schule Schloss Salem. To register for the newsletter it is necessary to provide an email address.

Processing for historical and archival purposes:

In order to enable historians and archivists the opportunity, within the scope of appropriate regulations, to determine whether a person of public interest attended the school. Storage of information about further studies and career choice of alumni also serves the purpose of determining the effectiveness of the school's pedagogical efforts.

Learning programmes:

For teaching purposes educational apps and learning platforms will be employed which require processing of personal data while students are enrolled.

Video recordings

For the purpose of monitoring the house rights, for the prevention of criminal offences as well as for the preservation of evidence in the event of criminal offences, video images of you and your children may be processed which are recorded as part of video surveillance on one of our premises.

To the extent the school has acquired your consent to the processing of personal data for certain purposes, such processing is based on Art. 6 (1 a) of the European Union General Data Protection Regulation (GDPR).

For the processing of personal data which is necessary for fulfilling a contract in connection with our business relationship, Art. 6 (1 b) GDPR serves as the legal basis. This also applies to preparatory procedures which are required for pre-contractual measures.

To the extent that the processing of personal data is required for the school to fulfil legal obligations which it is subject to, Art. 6 (1 c) GDPR serves as the legal basis.

In the case that the vital interests of you or your children make the use of personal data necessary, Art. 6 (1 d) GDPR serves as the legal basis.

Should processing be necessary to guarantee the legitimate interests of the school or of a third party and should your interests, fundamental rights and basic freedom not override these, Art. 6 (1 f) GDPR serves as the legal basis.

We process personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Law on Data Protection (BDSG).

Moreover the school processes personal data which can be obtained and may rightfully be obtained and processed from publicly accessible sources (press, media, internet).

a. In compliance with contractual obligations (Art. 6 (1 b) GDPR)

Processing personal data (see Section 2) is conducted in order to provide services, considerations and the requisite evaluations within the scope of fulfilling our school and boarding contracts with you or to carry our

pre-contractual procedures in response to your inquiries. Collection of data also includes that of your children or wards for whom you have parental authority.

The purpose of data processing serves primarily to fulfil school and boarding contracts or the preparatory selection processes involved therein.

b. In Connection with the balancing of interests (Art. 6 (1ff) GDPR)

To the extent necessary the school processes your data beyond the scope of the actual performance of the contract (and grants access to it to designated groups of people within the school) so as to protect justified interests of our own or those of third parties, such as

- advertising or marketing and opinion research, to the extent you have not revoked the use of your data,
- measures for securing our domiciliary rights and the rules and regulations of the school and boarding school,
- risk management,
- measures to secure buildings and grounds security (admission control),
- lodging legal claims and defence in case of legal disputes,
- prevention of criminal acts,
- health protection (e.g., data about prior illness and allergies)
- prevention of danger to life and limb
- assurance of creditworthiness.

c. As a result of your consent (Art. 6 (1 c) GDPR)

To the extent you have consented to the processing of personal data by us for certain purposes (such as using the contact form, press and media rights), such processing and the provision of data to third parties which you deem to be entitled (e.g., supplemental tutors, educational consultants or for medical treatment) is legitimate on the basis of your consent. Please refer to the respective statement of consent regarding the kind and extent of consent-based processing.

d. On the basis of statutory regulations (Art. 6 (1 c) GDPR)

The school is subject to a number of diverse legal obligations, e.g., statutory requirements (as stipulated by the Baden-Württemberg Ministry of Education), for which data processing is carried out.

e. Archival and historical purposes (Art. 6 (1 f) GDPR)

In addition we may store personal data for archival and historical purposes to the extent that such storage serves the public interest.

3. Your data is secure

Our staff and any service providers we engage are obligated to maintain discretion and comply with the regulations of applicable data protection laws. We follow all necessary technical and organisational measures to ensure an appropriate level of protection and to protect the data which we store from any risks, in particular, of unintentional or illegal destruction, manipulation, loss, alteration, unauthorised disclosure or unauthorised access. We continually improve our security measures to keep up with technological developments.

4. Who will receive my data?

Within the school, those departments will be granted access to your data that need them in order to fulfil our contractual and statutory rights and obligations. These include, for example, offices which supervise the Abitur programme or the organisations which conduct academic programmes (such as the International Baccalaureate).

Making data accessible to recipients outside our school to enable certain services (e.g., newsletter distribution, organising events, opinion surveys, archival storage, software maintenance, learning platforms and apps) will only occur if this is required by law, you have given your consent to it, or the data processing agency we have contractual relations with guarantees its compliance with the GDPR. We require service providers to maintain discretion and comply with statutory regulations.

Further data recipients can be organisations for which you have given us your consent, including Schule Schloss Salem e.V., Salem Kolleg gGmbH, the Friends of Salem Association, the school alumni association (Altsalemer Vereinigung e.V.), the Kurt Hahn Foundation, and individual patrons of the school who wish to maintain an overview of the performance of students they have sponsored.

5. Will the data be transferred to a third country or an international organisation?

A transfer of personal data to countries outside of the EU or the European Economic Area (so-called third countries) occurs only with your explicit consent, except where it is required by law or within the scope of sub-contracted data processing. If service providers are used that are based in third countries, they will be required – in addition to the written requirements included in the EU standard contractual clauses – to maintain European data protection standards.

6. How long will my data be stored?

Personal data of a specific individual will be erased or blocked as soon as it is no longer necessary for the intended purpose. Storage can also occur if provided for by European or national legislators in EU regulations, acts or other legislation to which the responsible parties are subject. A blocking or erasure of data then occurs when the prescribed storage period -- as defined by one of the aforementioned norms -- expires, unless further storage of the data is necessary for concluding a contract or the fulfilment of a contract.

The school follows the applicable guidelines for storage periods (date of deletion) as issued in administrative regulations by the Baden-Württemberg Ministry of Education. For the **erasure** of personal data of students the following time periods apply:

- Student file cards and student lists in paper form, as well as school-leaving certificates or ex-matriculation statements after fifty years, following departure.
- Contractual data after ten years.
- Health data after two years.

- Class and course books are to be destroyed after a period of five school years following completion.
- Written declarations of consent to publication of photos in a printed work which will no longer be printed are to be erased five years after the date of publication.
- Written declarations of consent to publication of photos on a website are to be erased five years after removal from the website.
- Grading lists and class tests are to be erased at the end of the following school year, provided that no appeals are pending.
- Examination materials such as transcripts and written examinations five years after the determination of the examination results.
- Application documentation for scholarships are to be erased six months after the achievement of the applicant's theoretical school-leaving certificate.
- Data about a donor half a year after death, since the necessity for maintaining good relations (e.g., congratulation upon anniversaries) has ceased.
- Data of agents and brokers for enrolment candidates are to be erased six months after the achievement of the respective applicant's theoretical school-leaving certificate.
- The email address for delivery of newsletters is to be erased as soon as consent has been revoked.
- Initiation of contact (Interest file) after five years.
- Student related data in learning platforms and apps will be erased at the end of school year in which a student graduates or leaves the school.
- Video recordings after 4 weeks

7. What are my rights with regard to data protection?

According to Art. 15 GDPR, every person has the right to information. Furthermore, you as data subject have the right make corrections according to Art. 16 GDPR, the right to erasure according to Art. 17 GDPR, the right to place restrictions on data processing according to Art. 18 GDPR, the right to revoke consent according to Art. 21 GDPR and the right to data portability according to Art. 20 GDPR. With regard to the right of access and the right to erasure, the restrictions set out in Sections 34 and 35 BDSG are applicable.

The consent you granted us for the processing of personal data may be revoked at any time by informing us accordingly. This also applies to the revocation of declarations of consent given to us before the effective date of the GDPR. Such revocations apply only for the future. Data processing that took place before the date of revocation are not affected.

8. Am I obliged to provide data -- is there contractual necessity?

Within the scope of our business relationship you are obliged to provide those personal data which are required for commencing and conducting the schooling and boarding process and for fulfilling

the associated business procedures (contractual rights and obligations) or which the school is required to collect by law.

9. Right to object / Revoking of consent

To the extent that your personal data are processed on the basis of legitimate interests according to Art. 6 (Para. 1 Sentence 1 Point (f)) GDPR, you have the right according to Art. 21 GDPR to object to the processing of your personal data if there are grounds relating to your particular situation. The same applies to revoking of consent which was given to us before GDPR came into effect. If you would like to exercise your right to object, an e-mail to [datenschutz\[at\]schule-schloss-salem\[dot\]de](mailto:datenschutz[at]schule-schloss-salem[dot]de) is sufficient.

10. Right to Lodge a complaint with a supervisory authority

Furthermore you have the right to lodge a complaint with the data protection authority of Baden-Württemberg at the following address:

Landesbeauftragt für den Datenschutz und die Informationsfreiheit, LfDI
Königsstrasse 10a
D-70173 Stuttgart
Tel.: 0711/615541-0 / FAX: 0711/615541-15
Email: poststelle@lfdi.bwl.de

11. Changes to this Data Protection Notice

We reserve the right to make changes to our Data Protection Notice. Therefore please take note of the latest version of our Data Protection Notice. This revision is dated October 2020.