

# COGNITA

## FOUR-FOREST BILINGUAL INTERNATIONAL SCHOOL – ONLINE LEARNING SUPPLEMENTARY PRIVACY NOTICE FOR PARENTS AND PUPILS

### INTRODUCTION

We are continuously committed to protecting and respecting the privacy of our parents and pupils and our staff regardless of whether our learning environment is onsite or online. We may consider it necessary or desirable to provide online education via our virtual learning programme (“VLP”).

Please read this supplementary privacy notice in conjunction with the Parent Privacy Notice, the Pupil Privacy Notice, and the School’s Photo and Video Consent Form (“Existing Notices”). This supplementary notice (together with the Existing Notices) sets out the basis on which any personal data we collect from parents and pupils is handled by us when taking part in our VLP.

### USES MADE OF THE INFORMATION

To ensure that educational content is presented in the most effective manner, and our pupils’ online experience is as appropriate as possible, delivery of educational services via our VLP will involve the processing of personal data, including in the following contexts:

- .1 pupils participating in live, online, face-to-face interactive lessons and tutorials with other pupils and teachers;
- .2 pupils participating in live video calls and tutorials with other pupils and teachers;
- .3 online chat services;
- .4 one-on-one sessions between teachers and pupils in specific cases for example for SEN, or for A-Level tuition;
- .5 pupil to pupil interaction;
- .6 peer review: teachers reviewing other teachers’ lessons for quality assurance;
- .7 recordings of the remote classes being made by the School and stored on the VLP (“Recordings”); and
- .8 recordings being shared between Cognita schools in the UK.

### BASIS OF PROCESSING

The School’s processing of personal data via the VLP is necessary for its legitimate interests, which in this context includes the following purposes:

- .9 to deliver educational services to our pupils and to monitor pupils’ progress and educational needs;
- .10 to promote and fulfil the objects and interests of the School and ensure its efficient management and administration; and

.11 to safeguard our children's welfare and provide appropriate pastoral care whilst they are taking part in the VLP.

Some of this activity undertaken via the VLP the School will need to carry out in order to fulfil its legal rights, duties or obligation – including those under a contract with its staff, or parents of pupils.

### **THIRD-PARTY SOFTWARE PLATFORMS**

We use third party software platforms including, but not limited to, Teams, Seesaw, Tapestry and Google Classroom, to facilitate our VLP; please also read the privacy notices, and applicable terms and conditions, provided by any such third parties. The third party notices will set out the data collection, use, and retention for the service they are providing. This notice only sets out how the School uses personal data for its VLP.

### **HOW LONG WE KEEP PERSONAL INFORMATION**

The Recordings shall be retained by the School for so long as the VLP is maintained by the School and thereafter in accordance with the School's Retention Policy.

### **QUESTIONS**

If you have any questions about this supplementary privacy notice, please contact the School's DPC.

### **CHANGES TO THIS POLICY**

The School reserves the right to update this supplementary notice at any time. You will be notified of any material change.

**Dated 24 October 2024**