

Privacy Policy

INTRODUCTION

This Privacy Policy ("**Policy**") sets forth the terms and conditions under which St. Michael's International School shall obtain and handle personal information. The meaning of the terms used in this Policy shall have the same meaning as defined in the Japanese Act on the Protection of Personal Information ("**APPI**").

1. Personal Information to be Obtained by the School

The School shall obtain the following information as Personal Information in accordance with this Policy:

- (1) Identification information such as without limitation name, address, gender, date of birth, telephone number, and email address;
- (2) Emergency information (contact information and medical information);
- (3) Official documents (passport, residence card) and information stated therein;
- (4) Information on financial accounts and other payment information such as without limitation credit card information;
- (5) Online identifiers such as cookie IDs, device information, location information, browsing history, and other similar information (including access logs, IP addresses, browser information, browser language settings and the like);
- (6) Student academic information and history;
- (7) Student medical data and immunization history (allergies, medications, medical recommendations, prescriptions, medical history,);
- (8) Demographic information (nationality, language, employer, gender, familial status, special guardian conditions and the like);
- (9) Learning support information (learning difficulties, medical recommendations, other support recommendations and the like);
- (10) Photos;
- (11) Security information (security camera footage, door access logs and the like);
- (12) Background and security check information, teaching, and employment history, staffing and incident records, housing information, and other legal information as required for employment in Japan; and
- (13) Any other relevant information required for the School's operation.

2. Purposes of Use

The School will obtain and use Personal Information within the scope of the following purposes of use ("**Purposes of Use**"):

- (1) To authenticate the identity of personal information subjects;
- (2) For the provision of educational services;
- (3) To respond to inquiries and contact Personal Information subjects;
- (4) For provision to third parties as set forth in this Policy
- (5) Admissions and application processes;
- (6) Medical activities and necessities;
- (7) Emergency situations and services;
- (8) Tracking attendance, enrollment, payment, and learning activities;
- (9) Child protection and incident management;
- (10) For processes required for the publishing of school yearbooks;
- (11) Implementation of school events, trips, and activities;
- (12) Payment processing and fee assessment;
- (13) School finance, budgeting, and planning activities;

- (14) Creation and implementation of school policies, procedures, agreements, and handbooks;
- (15) Alumni services; and
- (16) Hiring, employment, housing, and related activities; and
- (17) Any activities required for business operation of the School.

3. Provision to Third Parties

- (1) Except in the following cases, the School will not provide Personal Information to any third party without obtaining the prior consent of the Personal Information subject:
 - i. When required or allowed by law or any other applicable regulation;
 - ii. To comply with requests from authorities, court orders or legal procedures;
 - iii. When providing Personal Information to service providers of services necessary for educational activities conducted by the school, such as field trips, school excursions, student transportation, equipment procurement, extracurricular learning, and preparation of graduation albums/yearbooks;
 - iv. When disclosing information to entities that provide services (including without limitation the provision of lecturers) or IT platforms and the like used for the School's academic affairs or educational activities;
 - v. When disclosing information to businesses that manage the labor of the School's employees, pay wages, or provide services related to employee benefits; and
 - vi. When disclosing Personal Information to industrial physicians, lawyers, certified public accountants, tax accountants, labor and social security attorneys, and other professionals.
- (2) The third parties referred to herein may include parties overseas. Such parties are located either in the EU or the United Kingdom as well as the United States of America which generally implement the same standard of measure provided for herein regarding the handling of Personal Data. For further information, please access the information made available by the Personal Information Protection Committee at <https://www.ppc.go.jp/enforcement/infoprovision/>.

4. Safeguarding Measures

The School has in place the required and appropriate safeguarding measures to ensure that Personal Data is maintained safely to avoid loss, damage, or breaches in confidence. For a detailed outline of the safeguards the School has put in place, please get in touch with the contact information of Clause 6 (4) hereof.

- 5. The School, in accordance with the following terms, will either notify the purpose for which your Personal Data is being processed, disclose records regarding provision of your Personal Data to third parties, rectify, add, or delete your Personal Data, cease usage or provision to third parties of your Personal Data.
 - (1) You may, in accordance with the procedure set forth in Clause 6 (4) hereof and to the extent allowed by the APPI, request to be notified of the purposes for which your Personal Data is being used or request the disclosure of records regarding the disclosure of your Personal Data to third parties, provided, however, that this shall not apply in the following cases:
 - i. Cases in which there is a possibility of harming a principal or third party's life, body, assets or other rights and interests;
 - ii. Cases in which there is a possibility of serious interference with the School's operation of business; and
 - iii. Cases where disclosure would violate other laws or regulations; and
 - iv. When the School is unable to sufficiently confirm that you are the subject of the applicable Personal Data.
 - (2) You may, in accordance with the procedure set forth in Clause 6 (4) hereof, request for the amendment, addition, and deletion of your Personal Data upon which the School will undertake such amendment, addition or deletion to the extent provided for under the APPI.
 - (3) You may, in accordance with the procedure set forth in Clause 6 (4) hereof, request us to cease the use or provision to third parties of your Personal Data upon which the School will undertake what measures are required under the APPI.

- (4) Any requests related to the above rights may be made by sending such request in writing to head@smis-mail.org

When making any such request, please clearly state which of the categories of rights you wish to exercise (i.e., notification of purposes of use, disclosure of provision to third parties, rectification, addition, or deletion).

When making any such request, please enclose a copy of your identification document (which has your photograph, and which is issued by a government authority) so that the School may confirm that you are the subject of the Personal Data relevant to your request.

6. Cookies

The School's website uses cookies and other similar technologies for tracking and analysis (collectively, "**Cookies**").

(1) Overview

Cookies are small files that are exchanged between the web server and your internet browsing software (browser) and stored on your device when you visit a website. By using this information, the School may obtain your browsing history, service usage history, location information, and other information. Cookies are not linked to any information that is personally identifiable. If you reject the use of cookies or delete cookies, you may be limited in the functions you can use on the School's website.

(2) About Google Analytics

The School uses Google Analytics provided by Google. Google may collect and analyze your browsing history based on cookies set by the School or Google and use the results to understand how you use the School's services. For more information on Google's use of data in Google Analytics, please visit their website.

<https://policies.google.com/technologies/partner-sites>

7. Applicable law and amendments

Any dispute over privacy or Personal Information is subject to this policy and the applicable laws and regulations of Japan. This policy may be subject to change in accordance with the amendments of the applicable laws and regulations or changes in the relevant practices at the School. You are kindly requested to confirm this Policy regularly and to be aware of the newest version of this Policy. Unless stated otherwise, the current version of this Policy applies to all information that the School has about you.

APPENDIX

1. Storage of Data

The school has adopted best practices to ensure the security, accuracy, and accessibility of data. The school aims to prevent data breaches and to maintain the accuracy and integrity of student information, ultimately building trust among stakeholders and protecting student and employee privacy. Data is stored in a variety of places determined by the nature and purpose of the data collected:

1. **Enrollment and attendance data** related to children and their families is stored on an overseas, cloud based server [Classe e365] This company does not use any of the data the school stores and this is therefore not classed as a third party disclosure. This data is managed by the Communications Director who has received training on Japan's APPI data protection protocols. Any physical application forms and associated documents received at the time of the application are stored in a locked filing cabinet in the admissions office.
2. **Academic data** is stored on the school's team drive with access given to the relevant teachers who assess, record and report on student progress. This data is used to create academic reports which are shared with parents three times a year.
3. **Child protection and pastoral data** is stored on a cloud based system or 'hosted solution', called CPOMS. Access to CPOMS data is password protected, managed by the DSOL with limited access to class teachers for recording purposes only.
4. **Employment data** is stored on a separate external server. Access is limited to members of the senior leadership team who all hold a Safer Recruitment certificate. Documents submitted in support of Japanese work visa/immigration applications are stored in a locked filing cabinet in the Head of School's office. These documents can only be accessed by the Head of School and the office member with responsibility for immigration/visa applications.
5. The school maintains a **Single Central Record (SCR)**. The SCR contains: details of identity documents used as evidence for verification, relevant qualifications, certificates and registrations, reference checks, police and vetting checks. The SCR is stored on a dedicated Google team drive which is only accessed by the Head of School.