

Privacy Notice

1. General

This Privacy Notice sets out how XENION EDUCATION LIMITED, operating under its affiliated trade names XENION JUNIOR SCHOOL, XENION HIGH SCHOOL, XENION SUMMER FUN CLUB, XENION UNISTUDIES and XENION INSTITUTE (hereinafter referred to as "**Xenion**", "**Institution**", "**We**", "**Our**", or "**Us**") collects and processes personal data for the provision of services to its students (and their parents and/or guardians) ("**You**", "**Your**"). Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data.

This Privacy Notice includes all the information the Company, as controller under the law and the General Data Protection Regulation, Regulation (EU) 2016/679 ("GDPR"), has an obligation to provide you with, as data subject of the data it collects and processes.

Any questions relating to this Privacy Notice or requests in respect of personal data should be directed to the Data Protection Officer at monoyios@xenion.ac.cy

2. Who We are

Xenion Education Limited has been operating in the private education sector since 1980. For almost four decades we have been providing learning and teaching of the highest standards in our Language Institutes, our Primary School and High School.

Our main offices are located in Paralimni at 55 Xenion Education, 1st April Avenue, P.O. Box 33900 in Cyprus.

We strive to protect personal data and apply high standards of conduct when it comes to privacy issues. We ensure that its applicants are provided with the appropriate training in order to handle personal data securely and in accordance with the laws. Furthermore, we endeavor to ensure that any parties with whom we co-operate apply the same high standards when it comes to data protection and privacy as we do.

3. What services are offered through our website

The services offered at our website include, but are not limited to, the following:

a) Contact Form

You can use the contact form on our website under each school, to contact us for any request. The personal data that you filled out into the contact form will only be processed for answering your request. Filling in and submitting the contact form constitutes an affirmative action by which you have given your consent to the data processing.

b) Online Payments

You can use our online payment section by login to our MIS, in which you should have credentials upon registering your child. The online payment gateway of our MIS is JCC Payments Systems, and your personal data will be processed for as long as it is necessary to fulfill any obligations towards us, including payment of tuition fees online, except where we are legally obliged to further store your data for the purposes of

submitting it to public authorities, for example to tax authorities. This storage and transfer of your personal data to public authorities is based on fulfilling a legal obligation.

c) Enrolment/ Registration

If you wish, you can declare an interest to register a student online through our website (according to the school) by using the visiting the link under each school (High School, Junior school). The personal data that you provide in the contact us form will only be processed for reviewing, selecting and admitting students to our programs.

d) Access to our online portals

Parents and/or guardians can use our website to gain access to our MIS (Classter). By using the above portal, parents can access personal data and information in relation to their child(s) enrolled at the school, including exam grades and absences and other financial data relating to the child.

4. What Information we collect

Through our website, you can enrol or register to Xenion for any of its affiliated trade names, or you can make online payments (through our MIS) for the settlement of our tuition and any other related fees. We will collect the following data during the registration/enrollment and online payment process:

- personal information such as the student's name, the date of birth, the place of birth, religion, gender, ethnicity and nationality, mother language and second language (if applicable) and the information of previous schools, last available report card and a copy of the passport/ID;
- a passport photograph;
- contact details including the home address(local), the postcode and the mailing address (if for Cypriots and permanent residents) or address and contact telephone numbers in former country of residence, local address, local telephone number and mailing address (if students from abroad) and details of emergency contact;
- Contact details including proof of address of home country for overseas applications such as driving licence and Council tax bill/utility bill/water bill;
- family details such as the fathers/mothers and/or guardian's first and last name, nationality, place of birth, passport number or ID number, occupation, name of company/business address, business phone, mobile phone, home phone, email and education level. Additionally, we may collect information such as who the child lives with, the family status, as well as a contact person for official communications;
- safeguarding information (such as court orders and professional involvement);
- official documentation such as the student's birth certificate, , a copy of the child's 2most recent nursery or school reports (any reports from educational psychologists/speech and language therapists/educational therapists);
- number of children in the family (siblings at Xenion – now or previously);
- student's talents and interests;

- special educational needs (including the needs and ranking);
- medical and administration (such as doctors information including proof of vaccinations, child health, reports from educational psychologist/speak and language therapists/ occupational therapist if applicable dental health, allergies, medication and dietary requirements);
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended);
- assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results);
- behavioural information (such as exclusions and any relevant alternative provision put in place);
- photographs provided by the student or taken by us while attending Xenion;
- financial information, such as payment related information;
- meetings attended and visits to our offices;
- any other information you may provide to us.

This data is collected for the purposes of optimizing and improving our website as well as our online services. The processing is legally based on legitimate interest as it is in our legitimate interest to protect our website and to improve the quality of our services. Additionally, your personal data is only stored if you provide it to us on your own account, e.g. as part of a registration, a survey, an online application or for online payment (performance of a contract). We have taken appropriate measures to ensure that the data provided to us during the registration is adequately protected. These measures include, but are not limited to, encryption, access control, segregation of duties, internal audit etc.

5. Why we collect the information

Here at the Institution we take your privacy seriously and will only use your personal information in accordance with our Personal Data Protection Policy, in order to communicate with you about our services and to improve the quality of our services.

The purposes for which we collect your personal information are as follows:

- a. To register or enroll to one of our institutions through the online registration form;
- b. To make an online payment of our tuition fees from our online payment portal;
- c. To arrange an appointment, you have request through the contact page on our website
- d. To investigate and follow up on any comments, inquiries and complaints you may have and to resolve any disputes and problems which may have arisen with respect to the use of our services through our online contact form.
- e. To obtain feedback from you that will help us to improve and/ or further the provision of our facilities and services.
- f. To communicate with you about our services that may be of interest to you.
- g. To communicate with you about products and/or services of our affiliates that may be of interest to you.
- h. To inform you about promotional events, special offers, etc.

- i. To enable us to perform our obligations towards you.
- j. To comply with a legal obligation to which we may be subject.
- k. Any other purpose specifically requested and/or agreed by you

Your personal information is processed and stored in our central offices located in Paralimni. It will be accessed only by our employees or contractors who are authorized to do so under a duty of confidentiality and only for the purposes stated above.

We do not collect any personal data other than that specifically mentioned above, and we do not use your personal data without your explicit consent unless you ask us to do so.

You do not have an obligation to provide us with your personal data, but if you don't, we will not be able to provide you with our services.

We do not carry out any automated decision-making activities, including profiling, using your personal information.

6. Recipients of your personal information

Reasonable endeavors are made to ensure that data is only accessible by those with a need for access to fulfil the purposes set out above.

We use third party service providers process personal data in certain ways which are useful for the purposes of our services, such as Competitive Edge and Vertitech, which allow us to host the website, send you newsletters and company updates. These service providers are only allowed to process your personal data to the extent necessary to provide the services we have requested from them.

7. Retention of data

The Institution retains personal data in accordance with the Data Retention Policy. Any personal data provided to us is retained to fulfil the purposes for which the data was collected, as stated in paragraph 5 above. After the fulfilment of the purposes for which the personal data was collected, such data will be destroyed, and a Destruction Certificate will be retained in our records, unless destruction is prohibited for legal, regulatory or technical reasons.

Any data kept by us for marketing and information purposes will be retained until you inform us that you no longer wish to receive such information.

Any requests for further information in relation to the continued processing of specific data and requests for destruction of data should be made to dpo@xenion.ac.cy

For further information on our retention and destruction processes, please visit the Our Data Retention Policy at dpo@xenion.ac.cy

Any requests for further information in relation to the continued processing of specific data and requests for destruction of data should be made to dpo@xenion.ac.cy

8. Your rights

Should you believe that any personal information we hold on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted by contacting us at dpo@xenion.ac.cy

In the event that you wish to complain about how we have handled your personal data, please contact us at monoyios@xenion.ac.cy or in writing to our premises in Paralimni, Cyprus. We will then look into your complaint and work with you to resolve the matter.

In response to such requests, we reserve the right to require the individual making the request to provide certain details about himself/herself so that we can validate that the individual is indeed the person whom the data refers to. The Institution is required to respond to the request of the individual within 40 days and it will endeavor to do so wherever possible.

If you still feel that your personal data has not been handled appropriately according to the law, you can submit your complaint with the Office of the Commissioner for Personal Data Protection, at 1 Iasonos Street, 2nd Floor, 1082 Nicosia, tel. +357 22 818456, email address commissioner@dataprotection.gov.cy.