

DATA PROTECTION POLICY

Lycée Français International Georges Pompidou

Prepared by:	IT/Compliance Manager	Date: 10/06/2025
Approved by:	General Manager	Date:
Last reviewed on:	16/06/2025	
Next review due by:	16/06/2026	

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1. Purpose of the policy

This policy sets forth the principles and procedures governing the collection, use, storage, and sharing of personal data at the Lycée Français International Georges Pompidou (LFIGP). It aims to ensure full compliance with the UAE Personal Data Protection Law (PDPL) and to uphold the privacy rights of all individuals, including students, parents, employees, and third parties.

2. Scope of Application

This policy applies to all LFIGP employees, external service providers, and individuals who have access to or handle personal data within the school community. It includes data related to students, their families, staff members, and other individuals interacting with the school.

Special emphasis is placed on the protection of sensitive data—particularly student medical records. All individuals handling such data (e.g., teachers, administrators, health professionals) must strictly adhere to the principles outlined in this policy.

3. Definitions

Personal Data: Any information relating to an identified or identifiable natural person, whether directly or indirectly, by reference to identifiers such as name, voice, image, ID number, online identifier, geolocation, or characteristics of a physical, physiological, economic, cultural, or social nature.

4. Data Collection

LFIGP adheres to the principles of lawful, fair, and transparent data collection for legitimate purposes associated with education, student welfare, and administrative functions.

- **Purpose Limitation:** Personal data, including medical details (e.g., allergies, special needs, chronic illnesses), is collected solely for educational, operational, or legal purposes.
- **Data Minimization:** Only data that is strictly necessary for the specified purposes is collected.
- **Informed Consent:** The school ensures that parents, legal guardians, or staff members are adequately informed and provide explicit consent prior to data collection.

5. Data Processing

- **Confidentiality:** Personal data is treated as strictly confidential and is accessible only to authorized personnel on a need-to-know basis.
- **Security:** LFIGP implements appropriate technical and organizational measures to protect personal data against unauthorized access, alteration, or destruction.
- **Accuracy:** Reasonable efforts are made to ensure that all personal data remains accurate and up to date.
- **Retention:** Data is retained only for the duration necessary for academic, medical, legal, or administrative purposes, in accordance with the school's data retention schedule.

Category	Type of Record / Regulation	Typical Retention Period
Student Records	Academic transcripts	Permanently
Student Records	Report cards, assessments	10 years after student leaves
Student Records	Attendance records	5 years
Student Records	Disciplinary records	5 years or until student leaves
Student Records	Special Education (IEPs, SEN)	7 years after student leaves
Staff Records	Staff files	7 years after employment ends
Staff Records	Payroll records	7 years after employment ends
Staff Records	Performance evaluations	7 years after employment ends
Staff Records	Background checks	7 years after employment ends
Staff records	Facial recognition	1 week after employment ends
IT & System Logs	Email logs	3 years
IT & System Logs	User access logs	2 years
IT & System Logs	CCTV footage	45 days (longer if incident)
Administrative & Financial Records	Financial statements, audits	10 years
Administrative & Financial Records	Invoices and receipts	10 years
Administrative & Financial Records	Admissions documents	3 years if application is rejected
Administrative & Financial Records	Contracts (vendors, services)	Duration + 10 years

- **Disposal:** At the end of the retention period, personal data is permanently deleted or destroyed using secure methods.

6. Data Sharing

- **Third-Party Disclosure:** Personal data shall not be shared with third parties without the explicit written consent of the data subject or their legal representative, unless required by law or deemed essential for school operations.
- **Safeguarded Sharing:** When data is shared with third parties (e.g., educational service providers or healthcare partners), it is done under formal data processing agreements.
- **International Transfers:** Transfers of data outside the UAE are subject to strict safeguards to ensure the same level of protection.

7. Data Subject Rights

All individuals whose data is processed by LFIGP—including students, parents, employees, and contractors—have the following rights:

- **Access:** To request confirmation and obtain a copy of their personal data, along with information about how it is processed.
- **Rectification:** To request correction of inaccurate or incomplete data.
- **Erasure (Right to be Forgotten):** To request deletion of their personal data if:
 - It is no longer required for its original purpose;
 - Consent is withdrawn;
 - Processing is unlawful;
 - The school is legally obligated to erase the data.

All requests will be addressed within one calendar month.

8. Data protection officer (DPO)

A Data Protection Officer has been appointed to ensure ongoing compliance with data protection legislation, with a focus on sensitive data such as medical information.

Contact:

Email: dataprivacy@lfigp.org

Individuals may contact the DPO with any questions or concerns regarding data privacy or their personal data rights.

9. Data Breach Response

- **Reporting:** Any suspected or confirmed data breach involving personal data must be reported immediately to the DPO.
- **Investigation:** The School will promptly investigate all incidents and take necessary corrective actions.
- **Notification:** In the event of a serious breach affecting sensitive data, affected individuals and relevant authorities will be informed without delay, in accordance with regulatory requirements.

10. Training and Awareness

- **Training:** All employees will receive regular training on data protection practices
- **Awareness:** LFIGP is committed to fostering a culture of data protection by promoting awareness among staff, students, and families.

11. Policy Review

This policy is subject to annual review and will be updated as needed in response to changes in legislation, internal practices, or technological developments to ensure continued effectiveness in protecting personal data.