

Kivukoni School Data Protection Policy

January 2024

1. Introduction

Kivukoni School is committed to safeguarding the privacy and security of personal data entrusted to us. This Data Protection Policy outlines our practices for collecting, processing, storing, and disposing of personal data in accordance with the relevant data protection laws and regulations.

Personal data is broadly defined to include imagery, reporting, scoring, biodata, and any other sourced information.

Definition and Distinguishing:

- **Visual Media:** This refers to any form of imagery, such as photographs or videos, that may capture individuals associated with the school, including students, staff, parents, and other community members.
- **Other Forms of Personal Data:** This includes reporting, scoring, biodata, and any other sourced information that is not visually represented.

The policy aims to address the protection of all recorded personal data and it encompasses various aspects of data protection.

Balance:

It is important for schools to strike a balance between respecting the privacy choices of parents and fulfilling their legitimate interests in promoting the school and its activities. Clear communication, respect for privacy preferences, and compliance with data protection laws are key to achieving this balance.

It is our hope that with this policy, together with the Data Privacy Notice and Data and Marketing and Media consent Form, that communication is clear and your privacy and preferences are respected.

2. Scope

This policy applies to all personal data collected, processed, and stored by Kivukoni School, whether in electronic or paper format. It covers data relating to students, staff, parents, and any other individuals associated with the school. The term 'data' includes imagery, reporting, scoring, and biodata as well as any other sourced information.

3. Data Collection and Processing

3.1 Purpose Limitation: Personal data will only be collected for specified and legitimate purposes, and will not be processed in any way incompatible with those purposes.

3.2 Consent: All parents are requested to complete the [Marketing and Media Consent form](#), to indicate their preferences as parents when it comes to the sharing of images for regular school recording and marketing purposes. These preferences will be recorded and noted by all who handle school media.

3.2a Specific consent: Where required, for specific cases (such as big posters/ video productions) individuals will be informed and asked for explicit consent before their personal data is processed.

3.3 Data Minimization: Kivukoni School will only collect and process personal data that is adequate, relevant, and necessary for the purposes for which it is collected.

3.4. Parental and Community Responsibility: In accordance with our data protection policy, parents and community members of Kivukoni students are responsible for protecting the data security of individuals within the school. Kivukoni school does not hold liability if any parent or community member disregards the data protection policy, however it does remind and encourage parents to be respectful of other people's privacy and data protection at all times.

3.5 External Events and Hosts: When individuals travel outside the grounds of Kivukoni School and are subject to collection of imagery or data, hosts and event organisers will be alerted to our data protection of individuals. After this alert, Kivukoni School does not hold liability if these locations or hosts disregard the data protection policy.

4. Data Security

4.1 Confidentiality: Personal data will be treated as confidential and will only be accessed by authorised personnel on a need-to-know basis. There may be occasions where legal entities require and have access to data for specific purposes. Please refer to the [Data Privacy Notice](#) for more information regarding use of personal data.

4.2 Access Controls: Access to personal data will be restricted to individuals who require it for their job responsibilities. Access controls will be implemented to prevent unauthorised access.

4.3 Data Encryption: Where applicable, confidential personal data will be stored and transmitted in encrypted form to ensure its security.

5. Data Retention

5.1 Retention Period: Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable laws, preferences and regulations.

5.2 Data Disposal: Personal data that is no longer needed will be securely and permanently disposed of to prevent unauthorised access.

6. Data Subject Rights

6.1 Access and Correction: Individuals have the right to access their personal data held by the school and request corrections if necessary.

6.2 Deletion: Individuals have the right to request the deletion of their personal data under certain circumstances.

7. Data Breach Response

7.1 Reporting: Any suspected or confirmed data breaches will be promptly reported to the relevant authorities and affected individuals as required by law.

7.2 Investigation and Mitigation: Kivukoni School will promptly investigate any data breaches, take appropriate measures to mitigate the impact, and implement corrective actions to prevent future occurrences.

8. Training and Awareness

All staff and personnel will be trained on data protection policies and procedures to ensure compliance and awareness of their responsibilities.

9. Review and Updates

This policy will be reviewed regularly and updated as necessary to ensure its continued relevance and compliance with applicable data protection laws.

10. Contact Information

For any questions or concerns regarding data protection at Kivukoni School, please contact media and communications manager kivukoni_comms@kivukoni.co.ke

Reviewed: Kivukoni School 2024