



## Information addendum for students and parents

Rygaards Skole, CVR-no. 59416359 ("the School") is the data controller for the School's processing of personal information pertaining to students and parents. The School will ensure that all personal information is processed in accordance with the law.

### Contact information

If you wish to contact the School regarding the processing of personal information pertaining to students and parents, you can do so at:

Rygaards Skole  
Bernstorffsvej 54  
2900 Hellerup

[admin@rygaards.com](mailto:admin@rygaards.com)

("the School")

### Processing of personal information

Rygaards Skole will collect, store, and process personal information about students and their parents during enrolment and ongoing schooling.

This document contains information about how the School processes personal information, for what purposes, and what rights you have in connection with this.

The processing of personal information always has a legal basis, while adhering to best practice principles for data processing.

As baseline, the School collects and processes only the personal information that is necessary for the school to comply with its obligations in accordance with the Danish Free Schools Act (Friskoleloven) and related regulation.

The School also processes personal information if it is necessary for legitimate, operationally justified reasons, e.g. for the implementation of control measures, prevention of exam fraud and for use in the school's financial management.

All personal information about students and parents is processed with the aim of managing and documenting the students' schooling and that students meet the requirements for sitting exams on standard conditions.

### Waiting lists

Upon registering for the School's waiting list, the personal information submitted on the form will be processed.

The purpose of this processing is to be able to have the applicant on the School's waiting list.

The School primarily processes general information such as name, address and e-mail. This information is processed based on the School's legitimate interest in enrolling students at the school (GDPR art. 6(1)(f)).

In addition, the CPR numbers of the students and the students' parents are also processed. This is done on the basis of consent from the parents (Danish Data Protection Act § 11, subsection 2, no. 2).



If health information or other special categories of information are provided, when registering for the waiting list, the School will also process these. The School does this based on the express consent of the parents (GDPR art. 9(2)(a)).

Furthermore, parents may provide additional information in the admission interview at the School, e.g. professional opinions from kindergartens or regarding special needs. Such information will also be processed according to the processing bases indicated above.

Personal information on the waiting list is stored if the applicant is active on the waiting list. If the applicant is admitted to the School, the information will be stored in accordance the rules for registries of students at the School.

Once a year, parents are contacted to confirm that they are still interested in being on the waiting list.

## Enrolment

When the student is enrolled at the School, information about the student and their parents is collected and stored.

Generally, the School collects basic personal information about a student such as name, address and telephone number so that we may pursue our legitimate interest and get the student properly enrolled (GDPR art. 6(1)(f)).

The School also needs to obtain the student's CPR-no.. When the School collects CPR-nos. on students, this is for the purpose of fulfilling the School's obligations to the Ministry of Education, with regards to applying for grants and so that the Ministry of Education can check that the student is not enrolled at multiple schools (Danish Data Protection Act § 11, subsection 2, no. 3).

If health information or other special categories of information are provided at enrolment, these will also be processed. This is done as part of the School's legal obligation under the Danish Free Schools Act (Friskoleloven) to provide the necessary support to students (GDPR art. 9(2)(b)).

Beyond this, the School will obtain and manage consent to processing such as handing out class lists, permission slips for transport by car, permission to leave the school, and permission to use pictures of the students are also recorded. All this information is processed on the basis of consent (GDPR art. 6(1)(a)). If consent is given to the processing of special categories of information, e.g. when obtaining opinions prepared by Children's Services, psychologists or the like, the further processing of this information will also be based on this consent (GDPR art. 9(2)(a)).

The School also collects basic personal information about the parents. The School does this to secure necessary information about the student's legal guardians and to be able to inform about the School and the student, as well as the student's progress. The School does this to fulfil a legal obligation in the Danish Free Schools Act (GDPR art. 6(1)(c)).

### During schooling

During schooling at Rygaards Skole, the School primarily records information about the students' schedule, attendance, course of study, test results, including grades as well as any warnings and decisions. The processing of this information is done to further the purpose of schooling, including ensuring that the student is adequately prepared for exams, etc. The School therefore processes the information to ensure compliance with the legal obligations in the Danish Free Schools Act (GDPR art. 6(1)(c)).

The School will also process students' CPR-nos., to enable grant applications with the State, see above. (Danish Data Protection Act § 11, subsection 2, no. 3).

In addition to such general and confidential information, in certain cases special categories of information about the student must also be processed. This will be the case when e.g. school attendance and special needs affected by disabilities, special educational support, special social conditions, etc.

If such health information or other sensitive information is processed, this is done as part of the School's legal obligation, according to which the School is required in the Free Schools Act to provide the necessary support to the student (GDPR art. 9(2)(b)) or with the express consent of the parents (GDPR art. 9(2)(a)).



### **Education**

As part of the education at Rygaards Skole, students may be asked to record video or take pictures of each other for use in class, e.g. in connection with a presentation or a product. The aim is to give students appropriate tools and foster their development. The School does this because it is necessary for the pursuit a legitimate interest, which is to ensure that students receive the necessary education (GDPR art. 6(1)(f)).

At the same time, the School may use apps or other digital media that support the students' education. The School assesses whether the digital tool is suitable for the students and at the same time ensures that the students' information is processed according to principles and rules for data protection.

### **Communication between the School and parents, including on "ForældreIntra"**

The School stores and processes personal information about parents in the form of contact information. The personal information about parents is processed to enable the School to contact parents regarding the students' attendance and well-being as well as collection of tuition fees. Contact with parents takes place via "ForældreIntra", email, telephone and in some cases by letter.

Parents' CPR-no. is collected so that parents may receive a Uni-login, which is administered by the National Agency for IT and Learning, and thus access to "ForældreIntra."

To document the students' everyday life for the benefit of their parents, pictures of students alone or together with staff from the school can be shared on "ForældreIntra." The purpose is to give parents an insight into their children's school day. The School does this on the basis of our legitimate interest in ensuring that parents get this insight (GDPR art. 6(1)(f)). The School ensures that the images are only shared with those for whom they are relevant, e.g. only the parents of the class in question and not the whole school. Images are deleted routinely according to policy.

### **Study guidance**

Rygaards Skole offers study guidance to students. The School does this as it is necessary for the School to pursue its legitimate interest, which is to ensure that students receive the necessary guidance and support during their education at the school (GDPR art. 6(1)(f)).

As part of the study guidance, the School may process special categories of personal information about the student. As a rule, this only happens if the student provides the information themselves and if the information is relevant to the student's schooling. This may be the case if the information concerns the student's well-being or health, e.g. medical information as part of an absence. The purpose of the processing is to provide customized guidance for the individual student. The information is processed solely with the express consent of the student or their parents (GDPR art. 9(2)(a)).

### **Video surveillance**

Video surveillance is used at the School, where a sign indicates thus. The purpose is to prevent crime. The School does this because it is necessary for the School to pursue our legitimate interest in ensuring a safe learning environment for students (GDPR art. 6(1)(f)).

The recordings are deleted no later than 30 days after being recorded unless storage for a longer period is necessary for the handling of a dispute.

If criminal activity is recorded, the information is stored in accordance with the Danish Data Protection Act § 8, subsection 3, 2nd point. Information about criminal activity may be passed on to the police in accordance with the Danish Data protection Act § 8, subsection 4, 2nd point, in order for the police to decide on any further investigation, cf. Danish Administration of Justice Act § 742 (Retsplejeloven). This also applies if the basis for the report rests only on assumptions or suspicions, and regardless of whether it is a case of low criminality.



### **Logging and internet controls**

The School logs activities in systems where logging is a relevant part of security measures. This means that students' activities may also be recorded. For further information about what is logged, contact the School.

The purpose is to be able to investigate network errors, hacker behaviour, and virus attacks effectively, as well as issue warnings if the students' actions are illegal or inappropriate in other ways.

The School does this because it is necessary for the pursuit of our legitimate interest in investigating suspected misuse of the internet or e-mail accounts (GDPR art. 6(1)(f)).

The information is deleted after an assessment, but no later than 60 days after they have been documented, unless in cases of unresolved disputes.

### **Use of pictures and video**

Rygaards Skole would like to present the many different sides of school life to current and future students, parents, and other interested parties. For this purpose, the School uses pictures, video materials and personal information in the form of contact information. The processing takes place so that we may pursue our legitimate interest in showing the school's activities (GDPR art. 6(1)(f)).

The School has a strong focus on publication complying with applicable legislation and general morals and ethics. The decisive criterion in connection with the assessment of possible publication is that any person visible in the image cannot reasonably feel exposed, exploited, nor violated by its publication.

In some cases, the School must obtain consent for the publication of images and videos where the student can be clearly identified, e.g. photo or video on the School's website or on the School's profile on social media (GDPR art. 6(1)(a)).

The consent is given by the legal guardian(s). If the legal guardians do not live together, consent can be given by the residential parent. For students 7th grade and up, consent is also obtained from the students themselves, when the student is considered mature enough for it, see further information on this below under "Rights". Consent is only valid when it is given unanimously by parents and student. If there is disagreement between the student and the parents, the one whose position is most protective is followed.

The consent form will be issued separately.

### **Posting class photos at the School**

Rygaards Skole can have class photos, including old class photos of former students, as well as photos from major events at the School, hanging on the walls. This does not require the consent of students nor parents. The purpose of the processing is to provide an insight into the School's history and it is deemed necessary to show such images (GDPR art. 6(1)(f)).

### **Transfer of personal information**

The School is required to forward some personal information to the Ministry of Children and Education, the region, the municipality, the school nurse, psychologists, or other independent data controllers. This is only done when the school is required to do so.

In addition, the School uses data processors/vendors to process personal information. Priority is given to cooperation with vendors from the EU, as well as from third countries, approved by the EU Commission with regards to the level of protection around personal information in accordance with GDPR art. 45.

The School also uses some data processors/suppliers in unsafe third countries. When the legislation of third countries does not offer the same security as the EU does, the School has stricter obligations in the protection of personal information. Personal information may be transferred to data recipients in, for example, the USA based on the EU Commission's standard contracts (GDPR art. 46(2)(c)). If you require further information, please contact the School.



### **Parents' and students' use of pictures**

Rygaards Skole is not responsible for parents' and students' further use of pictures that the School e.g. has posted on the intranet, and which parents and students subsequently download. In addition, the school is not responsible for a parent taking a picture at an event at the school and sharing pictures on the internet afterwards.

The school is also not responsible for the students' further use of pictures taken with their own phones, where it is not part of their education, e.g. during recess.

### **School photos**

Rygaards Skole is not responsible for photos (class or portrait photos) that a professional photographer takes of the students, for the purpose of selling these pictures to the students. The professional photographer will be responsible for the use of the images for this purpose.

### **Media recordings at the School**

Rygaards Skole is not responsible if a media organisation, e.g. the local newspaper or TV station, on its own initiative, produces a story where pictures or videos of students are published in the newspaper, shown on TV or on the media outlet's website. The media themselves will be responsible for ensuring that the relevant rules are complied with.

## **After leaving the School**

The School stores personal information in accordance with all applicable guidelines. Overall, personal information is stored only as long as necessary for the fulfilment of the School's obligations. The school deletes all information about students and parents when the student leaves the school and when all obligations in connection with tuition fees and reports to public authorities have been finalised.

However, some information about the student is only deleted after up to 5 years, e.g. documentation for state grants, information pertaining to special education and SPS funds. If a complaint or insurance case is pending, information may also be stored for up to 5 years.

Parents' personal data is likewise deleted when the student has left the School. If, for example, information about parents' income or other circumstances has been obtained for the purpose of applications for free tuition, the information is stored for 5 years in accordance with the Danish Accounts Regulation.

The school saves the students' grades and test reports for 10 years. Diplomas are stored in perpetuity.

## **Rights**

You can make use of your rights as data subject by contacting the school. The rights are established in the GDPR and are as follows:

- *Right of access:* You can gain insight into what personal information pertaining to you or your child that the School processes, what the purpose of the processing is, how long the personal information is stored, where the School has the information from, who the information may have been obtained from or has been passed on to, and by which transfer mechanism personal information is transferred to third countries.
- *Right to rectification:* You can have your or your child's personal information rectified or added to if your information is found to be wrong or incomplete.
- *Right to erasure:* You can request that your or your child's information is erased, but the School may not be able to accommodate your request if day-to-day administration and operations require otherwise. The personal information will be stored for as long as



necessary for the administration and documentation of the students' schooling.

- *Right to restriction of processing:* You can have the processing of your or your child's personal information restricted if there is a good reason for it.
- *Right to data portability:* You may in some cases have the right to receive a copy of your or your child's personal information. The information will be delivered to you in a common and machine-readable format.
- *Right to object:* You can object to the processing of your or your child's personal information, if your interest in not having your information processed supersedes the School's legitimate interest in the processing.

If the personal data information will be processed for a purpose other than student administration, the school will inform you of this before the processing is initiated.

The above rights can be exercised by parents or guardians of a student, on behalf of the student, or to exercise the parent's own rights. Beyond this, you cannot exercise these rights on behalf of others.

If these rights are exercised, the school will respond to the request within one month.

If the school processes personal information illegally, you have the right to lodge a complaint with the supervisory authority (Datatilsynet). This can be done at [www.datatilsynet.dk](http://www.datatilsynet.dk)