

# General Privacy Notice

## Introduction

L'école Maternelle et Primaire Bilingue de Bâle, Les Coquelicots Switzerland is the Data Controller of the personal data you provide to LES COQUELICOTS. LES COQUELICOTS determines the purposes for which, and the manner in which, any personal data (e.g., relating to students and their families, employees, suppliers, business contacts and other third parties) is to be collected and processed.

Personal data shall mean any information that relates to an identified or identifiable living natural person.

LES COQUELICOTS's Director of Operations, Ms Isabel Brunner, acts as a representative for LES COQUELICOTS and as its Data Protection Officer. Responsibilities include: overseeing and monitoring LES COQUELICOTS's data protection procedures and ensuring they are compliant with Swiss data protection regulations (such as the Swiss Federal Act on Data Protection of 1 September 2023), and EU data protection regulations (General Data Protection Regulation 2016/679 of 27 April 2016 or GDPR), each as amended or replaced from time to time. She may be contacted at [i.brunner@ecbasel.ch](mailto:i.brunner@ecbasel.ch)

## The categories of personal data that we collect and process include

In general

- personal identifiers (such as name, business affiliation, contact details and address)
- payment details
- content of LES COQUELICOTS's communication with you
- engagement with LES COQUELICOTS, including, events attended, donations received, volunteer service
- security information (such as CCTV footage)
- cookies and other website usage data

Regarding students and their families

- personal identifiers (such as name, unique student number, family relationships, contact details and address)
- characteristics (such as gender, age, language and nationality)
- attendance information (such as classes attended, number of absences, absence reasons and any previous schools attended)
- assessment information (such as data scores, tracking, and internal and external testing)
- relevant medical information (such as insurance information, health conditions, physical and mental health care, immunizations and allergies, dietary requirements, and medication)

- special educational needs information (such as care or support plans)
- safeguarding information
- photographs and videos (see below)
- behavioral information (such as exclusions and any relevant provisions put in place)
- information regarding children's pastoral care and support

### **Why we collect and use personal data**

Personal data is generally used for the purposes of managing our relationship with you, communicating with you and/or to provide you with information you may request from us. More specifically, in line with applicable law, personal data may be used for the following purposes and for other purposes compatible with the purposes described below:

- to support student learning
- to monitor and report on student progress
- to provide appropriate first-aid and childcare
- to assess the quality of our services
- To meet the statutory requirements placed upon us by the cantonal and federal authorities
- to support our admissions process
- to inform parents about events, activities, and other things happening in the school
- to help investigate any concerns or complaints you may have
- to establish, defend or exercise claims
- to terminate our contractual relationship
- build and maintain the LES COQUELICOTS community
- make you aware and inform you about our services, news, events, and activities
- alumni: respond to your request regarding historic information about your time at LES COQUELICOTS

Personal data may further be used for any other purpose you give your explicit consent to, or for purposes that may be of a legitimate interest to LES COQUELICOTS.

### **Collecting personal data**

Most of the personal data mentioned is provided by you during the admission process and in the course of our contractual relationship or collected through the use of LES COQUELICOTS online services. Insofar as permitted, we may also hold personal data about our business partners, students and their families that we have received from publicly accessible sources (e.g., social media channels), authorities or other third parties, such as other schools.

When submitting personal data please make sure that the data is correct. When providing personal data about a person other than yourself, please make sure that you are permitted to provide the data and that this other person is aware of this Privacy Notice.

Personal data is essential for LES COQUELICOTS's operational use. While the majority of personal data you provide to us is mandatory for the conclusion and performance of our

contractual relationship, some of it may be provided on a voluntary basis. We will inform you when providing personal data is voluntary, or necessary to fulfill our contractual obligations.

### **Special rules on photographs and videos**

Photographs and videos of students, parents and employees may be taken to record and share daily campus life in the course of the school year. Students, parents, and employees may be identifiable in these photographs or videos. Such photographs and videos may be used for educational and internal informational purposes (e.g. keeping records of lessons, field trips, sports, events, employee training, yearbook, internal newsletter), for the identification of students, parents or employees for health related purposes (e.g. allergies), or for marketing and publication purposes, if and to the extent you gave us your consent where required under applicable data protection laws.

### **Storing personal data**

Personal data is stored in line with the Swiss data protection regulations and EU GDPR on servers located in Germany. LES COQUELICOTS maintains appropriate technical and organizational measures to preserve the confidentiality and integrity of your personal data (protection against unauthorized or unlawful access or processing, accidental loss, destruction or damage, cyber-security).

LES COQUELICOTS does not store personal data indefinitely; data is only stored for as long as is necessary to serve the purposes described above. It may be processed beyond the end of our contractual relationship to establish, defend or exercise claims (during the applicable limitation period), meet legal or post-contractual obligations, including legal documentation requirements, and to safeguard other legitimate interests of LES COQUELICOTS.

### **Who we share personal data with**

LES COQUELICOTS restricts the use of and access to personal data to those who have an absolute need to know in order to provide the services and serve the purposes described above (authorized personnel or agents). LES COQUELICOTS will not share your personal data with any external parties other than set out in this Privacy Notice, or except with your explicit prior consent, or as required under applicable laws or regulations.

External recipients who LES COQUELICOTS routinely shares personal data with are the following:

- any company or provider where sharing the information is necessary to make payments or book benefits to you
- schools that the students attend after leaving us
- our local, cantonal and federal authorities to meet our legal obligations
- the Swiss education authorities
- the student's family and representatives
- educators and examining bodies

- service providers to enable them to provide the service we have contracted them for (e.g., providers of IT services; academic service providers; providers of extra-curricular activities, internships and field trips; tertiary education institutions)
- our auditors
- health authorities and child protection authorities
- police forces, courts, tribunals

Where necessary, LES COQUELICOTS will oblige external recipients to comply with this Privacy Notice and to process personal data securely and exclusively for the purposes allowed by LES COQUELICOTS.

Transfer of personal data is usually limited to recipients located in Switzerland. However, transfer of personal data may occur to recipients located in the following countries: EU-EFTA, UK, USA. If external recipients or external service providers are located in countries whose legislation does not guarantee an adequate level of data protection, LES COQUELICOTS will implement suitable safeguards in the form of appropriate contractual clauses, namely standard contractual clauses and model contracts for data transfers recognized by the Swiss Federal Data Protection and Information Commissioner, in order to ensure compliance with this Privacy Notice and applicable laws.

### **Automated data decisions**

We usually do not use automated data decisions (these are decisions affecting data subjects that are completely automated, i.e. without human influence). Should this exceptionally be the case, we would inform you separately.

### **Your rights**

Under data protection legislation, you have some rights regarding your personal data processed by us in order to verify the lawfulness of processing. In particular, you have the right to:

- request information about your personal data processed by LES COQUELICOTS
- request a copy of the personal data LES COQUELICOTS holds on you; this includes the right to data portability, i.e., the right to receive your personal data in a structured, commonly used format
- restrict processing and/or object to the processing of personal data, in which case we may, however, no longer be in a position to provide any related services or perform our contractual obligations
- request that your personal data is erased where there is no compelling reason for its continued processing
- request that your personal data is amended if it is inaccurate or incomplete

Where the processing of your personal data is based on your consent, you have the right to withdraw this consent at any time. Such withdrawal of consent will not affect the lawfulness of the processing based on consent before the withdrawal.

Please note that your rights pursuant to this section may be limited in order to preserve any preponderant interest of LES COQUELICOTS or any third parties.

In addition, you have the right to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## **WEBSITE ANALYTICS**

We use website statistic packages such as Google Analytics to analyse trends in how our website is accessed and utilised. Information monitored includes internet protocol (IP) addresses, kind of device used, geographic location of visitors, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, time spent on pages, and keywords used to find our site via search engines. This information is anonymous and cannot be directly linked to individual users. We may use it to identify high-use or low-use areas of the site, pinpoint problem areas of the site, analyse broad demographic trends in our visitors and make decisions about how to make it easier for people to find and navigate our website.

If you do not want analytics to be used in your browser, you can install the Google Analytics browser add-on ([link](#)). More information about the ways in which Google Analytics collects and processes personal data may be found here ([link](#)).

## **Website Links**

This website may contain links to other sites. Please be aware that LES COQUELICOTS is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information.

## **Use of Cookies**

The LES COQUELICOTS website may use “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the LES COQUELICOTS website.

If you wish to disable cookies, you may do so through your individual browser options. More detailed information about cookie management with specific web browsers can be found at the browsers' respective websites.

## **Contact**

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with LES COQUELICOTS's Data Protection Officer, Ms Isabel Brunner, via email at [i.brunner@ecbasel.ch](mailto:i.brunner@ecbasel.ch)

## **Amendments and last update**

LES COQUELICOTS reserves the right to make changes to this Privacy Notice from time to time, for example in the event of new developments or new legislation. We recommend that you revisit this Privacy Notice from time to time. The applicable version is available on [www.ecolecoquelicots.ch](http://www.ecolecoquelicots.ch)

This version was last updated August 2023.