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English – Portuguese – Spanish

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I, the undersigned, Sworn Public Translator and Commercial Interpreter in and for the City and State of Rio de Janeiro, Federative Republic of Brazil, duly registered under Nº 147 at JUCERJA, on February 7<sup>th</sup> 2001, CERTIFY and ATTEST that a document written in PORTUGUESE was presented to me for translation into ENGLISH, which I have duly performed by reason of my official capacity, as follows:

TRANSLATION Nº 4340/2022



## DATA PROCESSING STATEMENT OF THE ADMINISTRATION OF THE BRITISH SCHOOL, RIO DE JANEIRO

The purpose of this statement is to demonstrate our commitment to safeguard your privacy and protect your Personal Data, setting out the rules on Treatment, as well as explaining your rights and how to exercise them.

This statement shall be read carefully and, if you have any doubts, feel free to contact us through the Service Channels available here.

The British School, Rio de Janeiro is committed to safeguarding Personal Data. This Statement is addressed to parents and guardians of one or more



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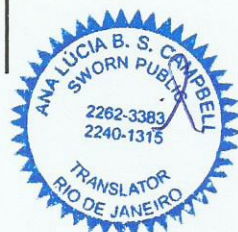
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students in any unit (Botafogo, Barra or Urca) and concerns the processing of the following information:

- . Personal data of parents and authorized persons  
5 for: interaction with the school in connection with the student's educational process;
- . Personal data of students during the educational process;
- . Identification and authentication;
- 10 . Compliance with the obligations arising from the use of our services;
- . Expand our relationship, informing you about innovations, features, news, content, and other events that we consider relevant to you;
- 15 . Enrich your experience and promote our products and services.
- . Compliance with our legal and regulatory obligations.

It also concerns privacy and covers the following  
20 areas:

- . What personal data we collect;
- . How we use your Personal Data and that of students for whom you are responsible;
- . Use of Special Categories of the Student's  
25 Personal Data;
- . Transmission, storage and security of your





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Personal Data and of any Student under your responsibility;

. Your rights and those of students for whom you are responsible in connection with your personal data collected and processed by us;

. Legal Basis

. Definitions

. Contact details

By providing your information or by providing the information of any students for whom you are responsible (whether through our website, in person, in writing or by telephone), you acknowledge the processing set out in this Statement. This Statement relates only to the processing carried out by or on behalf of the school. Although our websites may contain links to third party websites, please note that we do not accept any responsibility or liability for their policies regarding any personal data or their collection of any personal data.

Required data: Our services depend directly on the data mentioned above. We may be unable to provide all or part of our services if some of this data is missing.

Data updating and accuracy. You are solely responsible for the accuracy, correctness or



updating of the Data you provide to us. We are not obliged to process your Data if there are reasons to believe that such Processing could impute to us a violation of any applicable law, or if you are using our environments for any illegal or unlawful purposes.

**1. What personal data do we process?**

We may collect and process the following personal data about you and any student you are responsible for:

Personal data of the Parents:

**I.** Contact information: including first name, last name, address(es), telephone number(s), email address(es), etc.

**II.** Website and communication usage: details of visits to our websites and information collected through cookies and other tracking technologies, including, without limitation, IP address and domain name, browser version and operational system, traffic data, location data, web logs and other communications, accessed data and resources; Information you provide us: Any additional information you may provide us by completing inquiry forms or comments;

**III.** Authorization for Use of Image.

**2. How is your personal data collected?**





We may obtain personal data directly from you as the **Responsible**.

### 3. How we use your personal data?

5 Your Personal Data (and the data of any Student you are responsible for) shall only be processed if we have a specific purpose and legal basis for doing so. These purposes and bases are listed below.

Student data		Legal Basis		Reason for processing
Types of data collected		Contract Performance	Legitimate Interests	
(a) Biographical information and identification: name, Individual Taxpayer Registry (CPF), gender, nationality, date and place of birth, passport and identity;		X	X	To fulfil our obligations and provide our services. Conduction of extracurricular programs: organization, management and operation of expeditions and extracurricular activities, including payment processing, which may include transmission of personal data to third parties for insurance coverage, medical assistance, supervision and execution of activities; To secure receivables: when necessary to recover any payments due or to enforce such recovery by engaging third party for debt collection or bringing legal action (including initiating and prosecuting legal actions and court proceedings); Improvement of services: To analyse personal data to better understand your needs or those of any students for whom you are responsible. This will help us adapt and develop the services we offer.
(b) Student Information: This includes admission information (e.g., test scores), start date, Year Groups, class information, school ID, grades, schedules, transportation routes, photographs and communications with Parents or Guardians, teachers and other students and information relating to reports made by/about the student (e.g. reporting of bullying)		X	X	
(c) Health data such as information about any injury sustained by a student at school or during an extracurricular activity; any disability; health conditions relevant to education, and any health problems that may affect the ability to learn		X	X	Provide a safe and healthy environment for students and staff - We use this data to make appropriate provisions and adjustments related to the management of disabilities, allergies, illnesses and injuries, including providing such information to third parties such as insurance companies or medical professionals when appropriate.



**4. Sharing of personal data with other organizations:**

In order to effectively provide our education and learning services (including extracurricular activities), we sometimes need to share information with other organizations. We share information with the following companies:

(a) App for call control (application to speed up student departure);

(b) Door system (Access control to the unit);

(c) PTA (Parent Teacher Association), on the provision of extracurricular services.

(d) Authorities, according to the law;

(e) Educational control system (for educational control, grades, among others)

**5. Provision of data.**

The provision of data from those who send them directly, that is, depending on the case of the Parents, is a contractual requirement or a necessary requirement to enter into a contract.

The provision of data is necessary to ensure the purpose of the processing - participation of a student in the recruitment process for the School and Parent data, in order to enable such process for admission to the school or to carry out arrangements with the school for those admitted





students. Failure to provide data shall make it impossible to fulfil the purpose of processing.

**6. Consent.**

When a student is under the age of 18, we shall obtain explicit consent from a student's parent/guardian on their behalf. This consent shall remain valid until withdrawn by the parent/guardian or the student, provided that:

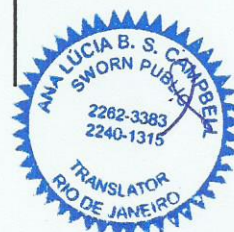
*The withdrawal of consent has no detrimental impact on the student's interests.*

**7. Transmission, storage and security of personal data.**

**Internet security**

No data transmission over the Internet or via website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your Personal Data and the Personal Data of any Student under your responsibility always in accordance with legal data protection requirements.

All information that you, or any Student connected to you, provide to us is stored on our suppliers' secure servers and such information is accessed and used in accordance with our security policies and standards.



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We ask that you or any student under your responsibility:

(a) Refrain from sharing any password providing access to certain parts of our sites, applications or systems;

(b) Comply with any other security procedures that we may notify you from time to time.

## **Storage Limits**

We shall use Personal Data as long as necessary for the processing purpose(s) for which it was collected - educational process, archival and any other related purpose(s) permitted up to the time limit for claims.

Therefore, if Personal Data is used for two purposes, we shall retain it until the expiration of the purpose of the most recent term; but we shall stop using it for the purpose of the shorter term. We restrict access to Personal Data to individuals who need to use it for the relevant purpose(s).

Our retention terms are based on business needs and relevant laws, particularly as they relate to the specific retention terms that may apply to the school. Records that are no longer needed are irreversibly anonymized (and anonymous information may be withheld) or securely





destroyed.

**8 - Rights relating to personal data.**

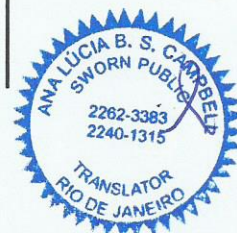
Be aware of the rights that Data Subjects have in connection with their Personal Data.

5 Data Subjects have several rights related to the use of their personal. Be aware that certain exceptions apply to the exercise of these rights and therefore you may not be able to exercise such rights in all situations. If you wish to  
10 exercise any of these rights, we will verify your right and respond within a reasonable time.

Where applicable, parents shall have the following rights in connection with their personal data or the personal data of a student  
15 for whom they are responsible:

**Subject Access:** ► Gain access to any Personal Data held about you/a student for whom you are responsible. Generally, this information shall be provided within one month after the confirmation  
20 of your identity and understanding the scope of your request.

**Withdrawal of Consent:** ► Withdraw any processing consents that you have given us or that have been given on your behalf and prevent further  
25 processing if there is no other reason, we can rely on to process your Personal Data. Withdrawal



of consent shall not affect the lawfulness of processing based on consent given before to its withdrawal.

**Restriction:** ► Require certain Personal Data to be marked as restricted in some circumstances, for example whilst we are resolving any complaints we may have received. Restriction means that although we will still store the data, we shall not process it until the restriction is lifted.

**Prevent processing:** ► Require the British School to stop any processing based on legitimate interests, unless the British School reasons for carrying out such processing outweigh any prejudice to your data protection rights.

**Marketing:** ► Require the British School to prevent the processing of your personal data for direct marketing purposes.

**Complaint:** ► Complain to your local Data Protection Authority about the processing of your Personal Data.

If you have any questions regarding your rights or the exercise of your rights, please contact the Data Protection Officer via email:

[protecaodedados@britishschool.gl2.br](mailto:protecaodedados@britishschool.gl2.br)

**9. Changes to Our Policy.**





Our Policy may change from time to time in the future. We therefore encourage you to review our policy when you visit the site periodically to stay informed about how we are using Personal Data.

**10. Legal Basis.**

The use of Personal Data under the data protection laws of Brazil shall be justified under one of different legal basis and we are required to establish the legal basis in relation to each use of this policy.

*The main legal basis justifying the use of your personal data are the following:*

**Consent:** You have given your consent to the processing of such personal data for one or more specified purposes. You are free to withdraw your consent by contacting us. When you do this, we may not be able to provide any service that requires the use of such data.

**Contract performance:** If your information is needed to contemplate or perform our contract with you.

**Legal Obligation:** If we need to use your information to comply with our legal obligations.

**Legitimate interests:** If we use your information to pursue a legitimate interest and our reasons



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for using it outweigh any prejudice to your data protection rights.

**Legal claims:** If your information is necessary for us to defend, prosecute or bring a claim  
5 against you, us or a third party.

*These are the main legal basis that justify the use of special categories of your personal data, in the limited circumstances where it is necessary to do:*

10 **Explicit consent:** You have given your explicit consent to the processing of this personal data for one or more specified purposes. You are free to withdraw your consent by contacting us. When  
15 you do this, we may not be able to provide a service that requires the use of such data.

**Protection of your or another person's vital interests where you are unable to consent:**  
Processing is necessary to protect your vital interests or the vital interests from another  
20 individual where you are physically incapable to giving consent.

**For legal proceedings:** Processing is necessary to bring, exercise or defend legal claims or  
whenever tribunals are acting in their judicial  
25 capacity.

**Substantial public interest:** Processing is





necessary for reasons of substantial public interest, based on Brazilian or local law.

**11. Definitions**

The following definitions are used in this Statement:

**Data Controller:** is the person who alone or jointly determines the purpose and means of processing Personal Data. The school is the data controller for all employment details used in its business.

**Operator:** is the company or professional directly responsible for data processing. Both the operator and the controller shall keep records about the data processing. The ANPD may request these reports to verify if the procedures are in compliance with the law.

**Personal Data:** Is any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified (directly or indirectly) by reference to an "identifier". These include names, identification numbers, location data, online identifiers or one or more specific factors to that individual's physical, psychological, genetic, mental, economic, cultural or social identity.



**Special categories of personal data:** This type of data is subject to more strict processing conditions than other Personal Data and includes Personal Data revealing racial or ethnic origin, political, religious or philosophical opinion and beliefs, trade union membership and genetic data processing, biometric data to uniquely identify an individual, or data about health, sex life, and sexual orientation. Health Data includes Personal Data relating to an individual's physical or mental health revealing information about the individual's health status.

**12. Contact details.**

You can contact us for the following:

- a) Make questions or comments about this statement and our privacy and personal data protection practices;
- b) Make a complaint;
- c) Confirmation of the existence of processing of your personal data;
- d) Obtain information on how to access your personal data;
- e) How to access and correct incomplete, inaccurate or outdated personal data;
- f) Obtain information on the anonymisation, blocking or deletion of unnecessary, excessive or





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processed data in breach of the provisions of current legislation;

g) Upon express request, obtain information about the portability of your personal data to another service or product provider in accordance with current legislation;

h) Request the deletion of personal data processed with your consent, except for the cases provided for in current legislation;

i) Request details of public and private entities with which we share your personal data;

j) Obtain information about the possibility of not providing consent and the consequences of this refusal;

k) Revoke consent for the processing of your personal data, except for the cases provided for in current legislation;

l) Other rights of the holder of personal data, according to current legislation.

m) For this, we request that you contact us using the email: [protecaodedados@britishschool.g12.br](mailto:protecaodedados@britishschool.g12.br)

The British School shall investigate and respond, within a reasonable time, to any request or complaint about the way in which we treat your personal data, including complaints about breach of your rights under applicable privacy and data



protection laws.

### 13 - Cookie policy?

#### Consent

By using the website of the British School, you  
5 consent to the use of cookies in accordance with  
this Cookie Policy.

You saw a pop up on your first visit to this  
site; and, although it generally does not appear  
on subsequent visits, you may withdraw your  
10 consent at any time by following the instructions  
below.

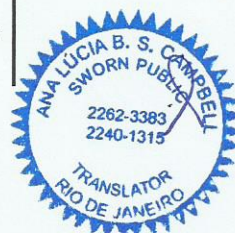
#### What is a cookie?

Cookie is a text file containing small amounts of  
information that are downloaded to your device  
15 when you visit a website.

Cookies are sent back to the originating web  
domain on your subsequent visits to that domain.  
Most web pages contain elements from multiple web  
domains, so when you visit the website, your  
20 browser may receive cookies from multiple  
sources.

We use cookies on this website to help you  
navigate our website efficiently, perform certain  
functions and collect website statistics.

25 These cookies do not store personal information  
that would, by itself, allow us to identify





individual users of this service without your permission.

Please be aware that restricting cookies may affect the functionality of the website and may mean that key features do not work properly. We strongly recommend allowing cookies from this website so that we can provide you with a complete service.

**What are the different types of cookies?**

**Session Cookies:** are temporary cookies that remain archived until the User exits the Platform or closes the browser.

**Persistent Cookies:** are cookies that are stored on the User's device until they are deleted (the time the Cookie will remain on the device depends on its "validity" and the settings of your internet browser). These cookies are used to access the Platform, showing the most relevant and personalized content according to the User's interests.

Cookies (Session or Persistent) can be categorized according to their function:

**Strictly Necessary Cookies:** allow navigation and use of applications, as well as access safety areas of the Platform. Without these cookies, the Platform does not work properly.



**Analytical Cookies:** collect anonymous statistical data in order to analyse the use of the Platform and its respective performance. This type of cookies is essential for us to maintain a positive performance, such as: understanding which pages are the most popular and checking the reason for the errors presented on the pages. These cookies do not collect any personal data.

**Functionality Cookies:** Whenever using the same device, such cookies are used to ensure the availability of additional Platform functionalities or to save the preferences defined by the User when browsing the internet. The User can change the settings to block its use or alert him when a cookie is being sent to his electronic device.

There are several ways to manage cookies. Consult your browser's instructions or the help, tools, or edit sections to learn more about how to adjust or change these settings.

Below are the most popular browsers:

Firefox

Chrome

Internet explorer

Safari

Opera





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Microsoft Edge

This policy was updated on November, 2022. .

\*\*\*\*\* THE ABOVE WAS the whole text of said  
document, the true translation whereof I  
5 ATTEST. Given under my hand and seal of  
office in Rio de Janeiro, on November 28,  
2022.



*[Handwritten signature]*

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