

## NOTICE ON THE PROTECTION OF STUDENTS' PERSONAL DATA

The Lycée Privé Emile Metz undertakes to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (GDPR) for all processing of personal data carried out in connection with the contract of education.

### 1. Purpose of processing

As a private school, the Lycée Privé Emile Metz collects, uses and processes your personal data.

It stores and processes the personal data of its students and acts as a "controller" of personal data under the GDPR.

Your personal data will be used exclusively for administrative purposes, for the management of the contract of education, and for the duration of the contractual relationship.

This use of your data enables us:

- To comply with the contract of education and legal requirements,
- To pursue the legitimate interests of the Lycée Privé Emile Metz, to ensure the maintenance of its IT system, to secure its communication channels or to protect its legal position in the event of legal proceedings.

In some cases, your data may be processed with your explicit consent, which you may withdraw at any time.

If in the future we intend to process your personal data for a purpose other than that for which it was collected, we will notify you of that purpose and of any other relevant information.

### 2. Types of data processed

Most of the information will be provided by you, but some may come from other internal sources (e.g. teaching staff) and in some cases external sources (e.g. previous schools).

Depending on the purpose of the data collection, we may collect the following data:

<b>STUDENTS</b>	
<b>Data Categories</b>	<b>Type of data</b>
Identification data	Last name, first name Date and place of birth Matricule number
Contact details	Postal address Email address Phone number
Details of the student's education	Date of registration, admission and departure Class, level, cycle Previous years' school reports
Sensitive data (depending on the student's personal situation)	State of health (diet, illness)

<b>LEGAL REPRESENTATIVE</b>	
<b>Data Categories</b>	<b>Type of data</b>
Identification data	Last name, first name Date and place of birth Matricule number
Contact details	Postal address Email address Private telephone number
Professional data	Business telephone number
Financial data	Bank details Payment details

### 3. Recipients of personal data

The following parties will have access to your personal data:

- The Lycée Privé Emile Metz and its legal representatives (Mr. Pascal Thill, Mr. Yves Wantz and Mr. Marco Hauptert);
- The Data Protection Officer (DPO);
- Public authorities if necessary for the purposes of the contract of education.

In addition, the Lycée Privé Emile Metz will only disclose information about you to third parties if required to do so by law or to comply with its contractual obligations.

In this case, a contract will be drawn up between the Lycée Privé Emile Metz and the processor concerned and appropriate technical and organisational measures will be taken in accordance with Articles 28 and 32 of the GDPR.

#### 4. Data retention period

The Lycée Privé Emile Metz will keep personal data for as long as necessary and as required by law and regulation.

In other words, we will keep your data for as long as is necessary for the performance of the contract of education and in accordance with the retention requirements laid down by law and regulation.

#### 5. Security measures

The Lycée Privé Emile Metz undertakes to implement technical measures to ensure the security of your personal data. We ensure that the persons authorised to process the personal data received are bound by a confidentiality agreement or are subject to an appropriate legal obligation of confidentiality.

This obligation of confidentiality remains in force after the end of the contract of education.

In assessing the appropriate level of security, we will take due account of the state of the art, the cost of implementation, the nature, scope, context and purpose of the processing and the risk to data subjects.

#### 6. Student rights

As an individual, you have several rights in relation to your personal data, in particular:

- **The right of access:** You may request access to your personal data and a copy of the data at any time.
- **The right of data rectification:** You may at any time request that inaccurate or incomplete data be corrected.
- **The right to erasure personal data:** You may request that your data be deleted when, for example, the data is no longer necessary for the purposes for which it was collected or processed.
- **The right to restrict processing:** The possibility of requesting that the processing of data be restricted (e.g.: if you doubt the accuracy of the data concerning you or if you object to the processing of data concerning you).
- **The right to portability:** The possibility to transfer your data to another controller in a structured, commonly used and machine-readable format if the processing is carried out by automated means or if it is based on prior consent.
- **The right to object to processing:** You may object to the processing of your data and withdraw your consent if the processing is based on consent (e.g.: *if the data is used for commercial purposes*).

To exercise these rights, students are invited to contact the Data Protection Officer (DPO) at [dpo@lpem.lu](mailto:dpo@lpem.lu)

All requests will be dealt with by the DPO within one month, following verification of the applicant's identity if necessary. This period may be extended to a further 2 months if your request is complex or if there are many requests. Requests will be accepted within the limits set by law, and in particular Articles 15 to 23 of the GDPR.

If you are not satisfied with our response, you also have the right to lodge a complaint at any time with the Commission nationale pour la protection des données ("CNPD"), the Luxembourg data protection supervisory authority, or with any other competent supervisory authority in an EU Member State.

It is also possible to lodge a complaint directly with the competent supervisory authority if you believe that your personal data is being processed in a manner that is in breach of GDPR.

## **7. Updating this policy**

We regularly review this notice and may change, add to or remove parts of this document at any time. Employees will be notified of any changes before they take effect.

In the interests of fluidity and readability, the masculine singular form has been adopted in this text. However, this form is neutral and includes all gender identities without distinction.