



SABIS®

PRIVACY STATEMENT

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Updated on September 2021

INTRODUCTION

SABIS Educational Services S.A.L. (collectively referred to as “SES”, “we”, “us”, “our”, or “ours”), whose registered office is at Street No.15, Orange Zone, Adma, Keserwan, Lebanon, values and takes your privacy rights seriously. We are committed to being transparent about the personal data we collect about our students, and parents/guardians, how it is used, and with whom it is shared as set forth herein and in accordance with the data protection and privacy regulations.

This Privacy Statement (the “Statement”) applies to the personal data collected from all users of the SABIS® Parents application (the “Application”) and the services available on the Application (the “Services”).

The recipient and data controller responsible for processing the personal data is:
SABIS Educational Services S.A.L. – Lebanon
Orange Zone, Street No.15, Adma
Keserwan, Lebanon
Telephone: +961 9 851951

The terms “you,” “your,” and “yours” refer to the user of the Application / Services.

This Statement sets out the basis on which any personal data we may collect about you, or that you choose to provide to us, and your choices and rights regarding our use of your personal data. It also explains the purpose of processing your personal data and how we keep it safe. Please read the following sections carefully to understand our views and practices regarding your personal data and how we handle it.

We reserve the right to make changes periodically to this Statement at our sole discretion. Changes to the Statement will be posted on this page.

HOW TO CONTACT US

Questions, comments, and requests regarding this Statement should be addressed to our Data Protection Officer via E-mail at dpo@sabis.net.

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DEFINITIONS

Personal Data: Personal data is defined as “any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.”

Processing: Any operation performed upon personal data, including but not limited to collection, storage, use, erasure, recording, disclosure, transmission, alteration, distribution, etc.

Data Subject: Any individual whose personal data is being collected, held, or processed.

DATA COLLECTION

As a parent/guardian, we will be using the personal data collected voluntarily and directly from you, upon your child's admission/registration at a SABIS® school, for us to provide you with the credentials (username/password) to access the Application and to benefit from its Services.

The type of personal data that the school collects about students and parents and/or guardians (the “Parents”) and that SES replicates, include the following:

- Contact Details (e.g. name, home address, work address, E-mail address, phone number(s))
- Identity Verification (e.g. date of birth, nationality, photo)

When you use the Application, SES receives information about your mobile device (e.g. model number, OS version, Application version), which allows us when you consent to receive notifications to reliably and directly send push notifications to your device using Firebase Cloud Messaging (FCM), a cloud service messaging solution from Google.

Firebase Cloud Messaging (FCM) collects the following information from you:

- Instance ID (a unique, random ID created by your device).

Firebase Cloud Messaging uses instance IDs to determine which devices to deliver messages to. Firebase retains Instance IDs until we delete the ID upon your request. After the deletion, your instance ID data is deleted from our production and backup systems within 60 days.

To know more about the security and privacy in FCM, you can visit the following link <https://firebase.google.com/support/privacy>.

To stop receiving push notifications, please turn off the respective service in the device's settings.

SES will not collect or process personal data that is considered sensitive, revealing racial or ethnic origin, political opinions, religious, or philosophical beliefs.



PURPOSE OF DATA PROCESSING

The personal data will be appropriately used to support student learning, allowing you to monitor as well as follow up on your child's/children's academic and non-academic performance.

- Academic information: display exams results, course averages, attendance and discipline records, Student Life Organization® (SLO®) participation in activities, school calendar, study material (downloadable documents, videos, quizzes), and online courses.
- Non-academic information: announcements, photo galleries, and videos.

In addition, we may send you notification messages, if you allow us, on your mobile device informing you and helping you stay updated about any announcement.

DATA STORAGE AND RETENTION

We will endeavor to keep your personal data accurate and up-to-date, and not retain it for longer than it is necessary.

Your personal data will be processed by us and stored in an anonymized format in our databases located in the Microsoft Azure Cloud North Europe for twenty-five years after the student's graduation/departure from the SABIS® School.

DATA SECURITY

The security of your personal data, processed for the above-mentioned purpose, is important to us and we confirm to implement acceptable security measures and procedures to ensure the confidentiality, integrity, and availability of the data.

We take reasonable precautions to protect your personal data against accidental or unlawful destruction or loss, alteration, unauthorized disclosure, or access. These precautions include appropriate technical, physical, and organizational security measures.

We make reasonable efforts to restrict access to information to only authorized employees who need such access to operate, develop, improve, support, or deliver our services.

Please note that you are responsible for maintaining the security of your credentials used to access the Application, and you must report suspected unauthorized activity to us.

DATA TRANSFER AND SHARING

We will not share, disclose, or transfer your personal data to any third party other than FCM under any circumstances unless required by law or without first obtaining your consent.



LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

As a parent/guardian, the legal basis for the processing of your personal data is your consent being the data subject.

We process your personal data if you have consented to the processing activity. You may revoke your consent at any time by sending an E-mail to privacy@sabis.net. Doing so will bar us from further processing of your personal data based on your consent, will cease your access to and use of the Application, but will not impact the lawfulness of processing based on your consent before it was withdrawn.

DATA SUBJECT RIGHTS

In certain circumstances, you have certain rights regarding your personal data. A summary of each right and how you can exercise it is set out below. To exercise any of these rights, please contact us by sending an E-mail to privacy@sabis.net

- Right of access – you have the right to request from us a copy of the personal data we hold about you.
- Right of rectification – you have the right to ask us to correct inaccurate or incomplete data we hold about you.
- Right to request deletion – in certain circumstances, you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – under certain conditions, you have the right to ask us to restrict the processing of your personal data.
- Right of portability – you have the right to have the data we hold about you in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another organization, where technically feasible.
- Right to object – you have the right to object to certain types of processing, such as direct marketing.
- Right to object to automated processing, including profiling – profiling-based activities are not carried out under any circumstances.
- Right to complain – if you object to our processing of your personal data, you have the right to complain to the Data Protection Authority (DPA) in the country where you reside, or the alleged infringement of data protection laws has taken place.

ACCEPTANCE CLAUSE

By clicking the “I Agree” button below, you are explicitly consenting and confirming that you have read and agree to this Privacy Statement's terms and conditions governing the use of the SABIS® Parent application.

At times, we may change and/or update this Statement. If this Statement changes in any way, we will post an updated version, ask for your consent to ensure that you are always aware of our information practices and any applied changes.



CONCERNS AND INQUIRIES

For data protection inquiries, or if you consider that we did not process your personal data in accordance with the applicable regulations, please contact us by sending an E-mail to privacy@sabis.net.