



مدرسة جيمس وينشستر
GEMS Winchester School
FUJAIRAH

GEMS WSF Privacy Policy

We, GEMS Winchester School Fujairah and certain of our group companies (“GEMS”, “we” or “us”), maintain the information and materials on the www.gemswinchesterschool-fujairah.com website and ask you to take the time to read this Privacy Policy carefully. This Privacy Policy applies to visitors and users (individually, “you”) of the Site (as defined below). As educators, we take your privacy seriously and know the importance of trust. We have created this Privacy Policy so you know how we collect, use, process or store any personal information you give us.

By using our website (the “Site”), including signing up for any newsletters or feeds, you are agreeing to be bound by our Terms and Conditions, which include this Privacy Policy. By visiting or using the Site, to the extent permitted by applicable law you are consenting to us gathering and processing information about you in accordance with this Privacy Policy, although consent may not be required for all of the elements described in this Privacy Policy. For particular types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it.

This Privacy Policy does not cover third parties or their services and we do not take any responsibility for how such third parties may use any information they collect. For information about third-party privacy practices, please consult with them directly.

We will always aim to be respectful if you have given us consent to contact you. If at any time you don't feel we've lived up to this, please let us know straight away by contacting us via the contact section of the Site or through the contact details set out in the Contact Us section below.

Please take the time to read this Privacy Policy and note that it may change from time to time. You can always find an up-to-date version here on this page.

1. What information do we gather?

We may collect and process the following information in electronic and/or physical from you:

1.1. If you are interested in enrolling and/or registering your child into one of our GEMS schools or GEMS initiatives, the following information below may be collected from you. If you are already in the process of enrollment and/or registration or are an existing parent with a student in our GEMS community, please also refer to the Parent and Student Privacy Notice provided to you for further information on how and why we collect personal information about you:

1.1.1. Your and/or your child's personal information such as names; title; postal address; email address; phone number; dates of birth; gender; occupation information; government issued ID information; visa information; religious beliefs; etc.;

1.1.2. Admissions and enrollment information, including for example information you have provided on your child's application forms and during the enrollment process, information on your child's educational background, grades, and courses taken, information from references, information about your child's interests, and information from educational institutions attended previously;

1.1.3. Your child's health information and background such as immunization records; health issues; health restrictions; information on disabilities; any emotional, learning, physical and other health needs; etc.

1.1.4. information that you provide to us during the course of your child's education;

1.1.5. marketing responses, such as child's current school, preferred curriculum, preferred location, preferred budget, preferred school;

1.1.6. survey responses, such as parent satisfaction score, net promoter score, school feedback and school rating criteria, etc;

1.1.7. information about your computer, including where available the IP address of your computer/proxy server that you use to access the internet, your web browser type, type of mobile device, and computer operating system, to analyze trends among our users and to help improve our Site.

1.2. If you are applying to be a new member of staff, the following information below may be collected from you. If you are already in the process of becoming on-boarded or are an existing staff member of GEMS, please also refer to the Staff Privacy Notice provided to you for further information on how and why we collect personal information about you:

1.2.1. Personal information such as name; title; next of kin; postal address; email address; phone number; date and country of birth; religious beliefs and practices; gender; nationality; government issued ID information; visa information; number of dependents; etc.;

1.2.2. information about your background such as education, qualifications and professional achievements;

1.2.3. information we receive from you and third parties when carrying out pre-employment checks, for example when we receive references on your behalf;

1.2.4. marketing responses;

1.2.5. information about your computer, including where available the IP address of your computer/proxy server that you use to access the internet, your web browser type, type of mobile device, and computer operating system, to analyze trends among our users and to help improve our Site.

2. How do we gather this information?

The lawful bases we rely on for processing your information are:

2.1. We have a legitimate interest, except where processing is unfair to you. GEMS relies on legitimate interests for most of the way in which it uses your information. GEMS has a legitimate interest in: providing education services to children; ensuring a safe and secure educational and working environment; safeguarding and promoting the welfare and development of all staff and children; protecting and promoting the objects and interest of GEMS (including fundraising); facilitating the efficient operation of GEMS; ensuring our compliance with employment obligations; and ensuring all relevant legal obligations are complied with.

2.2. We have a contractual obligation. We will need to use your information in order to perform any existing obligations under a contract with you.

2.3. We have a legal obligation. We may need to use your information in order to comply with a legal obligation, for example to fulfil our safeguarding duties to staff and students.

2.4. We have a vital interest, for example preventing someone from being seriously harmed.

2.5. We have a public interest. GEMS considers that it is acting in the public interest when providing educational services to students and employment opportunities to individuals.

2.6. We have your consent. You are entitled to request that we stop any consent-based processing of your personal information after you withdraw that consent. You can do this by contacting us at the relevant contact details below.

The lawful bases we rely on for processing special categories of personal information are the below, where we are required to comply with additional conditions to process such information (including, information concerning racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade-union membership and health or sex life, and including genetic data and biometric data where it is used for the purpose of uniquely identifying a person):

2.7. We have a public interest. GEMS considers that it is acting in the public interest when providing educational services to students and employment opportunities to individuals.

2.8. To protect the vital interests of any person, where for example that person cannot give consent or in order to prevent someone from being seriously harmed or killed.

2.9. The processing of this information is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

2.10. For the purposes of medical treatment and management of healthcare services.

2.11. We have your consent. You are entitled to request that we stop any consent-based processing of your personal information after you withdraw that consent. You can do this by contacting us at the relevant contact details in the Contact Us section below.

As mentioned above, in some cases we will rely on more than one of the grounds above for a particular use of your information. The ground that we will rely on for a particular purpose may vary depending on the circumstances.

You directly provide us with most of the information that we collect, whether in digital or non-digital formats. We collect information and process information through the following ways:

2.12. Information that you provide by filling in forms electronically on our Site or in physical form in person, including, without limitation, Information provided at the time of registering to use our Site, subscribing to a service, enrolling your child to one of our schools or initiatives, submitting a job application, entering into a contract with us, posting material on our Site, or requesting further information or services from us.

2.13. We may also ask you for your Information if you report a problem with the Site.

2.14. If you contact us, we may keep a record of that correspondence and the information within it.

2.15. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

2.16. If you carry out any transactions through the Site or otherwise and through the fulfillment of your orders and requests.

2.17. If you want to sign up to receive our newsletter or any feeds.

3. How we use the information

We use the information held about you in the following ways and for the following purposes:

3.1. To register and respond to your application and career or enrollment queries.

3.2. To provide you with the services and functionality offered through the Site and to fulfil your requests, including, but not limited, to communicating with you about your enquiry or use of the Site, services, or functionality.

3.3. To respond to, or follow up on, your comments and questions, and otherwise provide customer service.

3.4. To operate and improve the Site, services, and functionality and tailor your experience on the Site, including search results and displaying relevant promotions.

3.5. To ensure that the Site is presented in the most effective manner for you and for your computer.

3.6. To provide you with information, products or services that you request from us or which we feel may interest you, based on information we collect from cookies or where you have consented to be contacted for such purposes.

3.7. To send you relevant news if you have signed up to receive it.

3.8. To occasionally carry out surveys to ensure that we are providing you with what you are interested in.

3.8.1. To perform statistical analysis.

3.8.2. To comply with our policies, procedures and legal obligations.

3.8.3. To protect, investigate and deter against fraudulent, unauthorized, or illegal activity, including as we feel is necessary to protect our interest.

3.8.4. To carry out our obligations arising from any contracts entered into between you and us.

3.8.5. To allow you to participate in any interactive features of the Site, when you choose to do so.

3.8.6. To promoting the objectives and interests of GEMS, including fundraising and marketing.

3.8.7. To check whether you are eligible for a competition and to contact you if you win.

3.8.8. To notify you about changes to our services.

3.8.9. As otherwise consented by you and as otherwise permitted by applicable law.

4. Will we share your information with anyone else?

4.1. Yes if...

4.1.1. You specifically request this, such as when you submit information to enquire about jobs or submit a job application through the GEMS Education Careers website for current or future roles.

4.1.2. You specifically request this, such as when you submit information to enquire about enrollment for your child at a relevant GEMS school or GEMS initiative.

4.1.3. We are required to do so to comply with our internal policies and procedures or the law, or with direction from the courts or other authorities.

4.1.4. We feel it is reasonably necessary to prevent illegal activity or to protect our interests, such as when someone has breached Paragraph 2 of the Terms and Conditions (Use of the Site and User Code of Conduct).

4.1.5. We appoint consultants, experts and other advisors to assist GEMS in fulfilling its obligations and need to share your information with them if it is relevant to their work.

4.1.6. It helps our trusted third-party service providers to provide and improve our service to you or to carry out surveys and user analysis to understand your needs and preferences. We will also share your information with mass mail service provider, who securely hosts emails and acts as a supplier to distribute our newsletters. We require these service providers to keep your personal information safe and secure. These trusted third parties would only be permitted to use your personal information for the purposes we specify.

4.2. We may also share your information with other GEMS group companies and affiliates.

4.3. We won't rent or sell your details to any other organisation or individual. We may share some broader statistics and customer profiling information with third parties, but we'll keep it anonymous, so you won't be identifiable from that data.

5. Where we store and process the information

5.1. The information we collect from you is partly stored on servers in the UAE and EU, as well as in the location where the relevant GEMS school or business operates (such as in specific EU member states, the UAE, Egypt, Qatar, Singapore, Malaysia, Kenya, Uganda, India etc.). Your data may be transferred, stored and processed in countries which do not have data privacy laws as strong as those in the UAE, and may also be processed by people operating outside the UAE who work for us or one of our suppliers. By submitting the information, you acknowledge and agree to this transfer, storing or processing across national borders and entities as needed to provide you with the service you have asked from us. We will take commercially-reasonably steps necessary to ensure that the information is treated securely and in accordance with this Privacy Policy.

5.2. We will retain your information for the period necessary to fulfil the purposes outlined in this Privacy Policy and as otherwise needed to comply with applicable law and internal company policies.

6. Security

6.1.1. We understand the importance of securing your personal information in our care. We utilize reasonable security measures that include technical, administrative and physical safeguards to secure your personal information in our care from unauthorized access, modification, disclosure or destruction.

6.1.2. However, if you provide us with personal information over the internet, you should be aware that the absolute security of the information transmitted over the internet or stored in electronic storage cannot be guaranteed to be 100% secure. While we take reasonable efforts to protect such personal information, you acknowledge that we cannot ensure or warrant the security of any personal information provided by these means and you provide it to us at your own risk.

7. Password and Confidentiality

7.1. If you are provided with a user identification code, password or any other piece of information as part of our security procedures, you are responsible for maintaining the confidentiality of your password and user name for the Site and you are responsible for all activities that are carried out under them. We do not have the means to check the identities of people using the Site and we will not be liable where your password or user name is used by someone else.

7.2. You agree to contact us immediately and inform us of any unauthorised use of your password or user name of which you become aware. We have the right to disable any user identification code or password, whether chosen by you or allocated by us, at any time, if in our opinion, you have failed to comply with any of the provisions of this Privacy Policy or the Terms and Conditions .

8. Your data protection rights

8.1. You have the right to ask us for copies of your information, which is free of charge in most cases.

8.2. You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

8.3. You have the right to ask us to erase your information in certain circumstances.

8.4. You have the right to object to the processing of your information in certain circumstances.

8.5. You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

8.6. We may request proof of your identity before we disclose such information to you. That's so we can prevent unauthorised access. Just write to us at the contact details provided in the Contact Us section below.

9. Consent

9.1. By submitting information to us, you consent to our collection, storing and processing of your information in accordance with this Privacy Policy. You are entitled to request that we stop any consent-

based processing of your personal information after you withdraw that consent. Please contact us at the relevant contact details in the Contact Us section below.

9.2. You are entitled to ask us not to process your personal information for marketing purposes. Please contact us at the relevant contact details in the Contact Us section below.

9.3. What about personal information relating to minors? As educators, protecting the online privacy of children is especially important to us. If you are under 21 years old, please do not provide us with your name, contact details or any other information about yourself. To find out more, please read our Terms and Conditions.

10. Information you share socially

10.1. The Site may allow you to connect and share your actions, comments, content, and information publicly or with friends. The Site may also allow you to connect with us on, share on, and use third-party platforms, including those on which GEMS has a presence. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. GEMS also does not control the privacy practices of third-party platforms. Please contact those websites and services directly to learn about their privacy practices.

11. Are you protected by this policy on other websites that are not our Site?

11.1. Our Site contains links to other third-party websites and platforms. We do not have any control over them and take no responsibility for any information you give them. Other third-party websites and platforms have different privacy and security policies, which we advise you to read. Please contact those websites and services directly to learn about their privacy practices.

12. COOKIES

12.1. We use cookies to personalize content and to provide you with an improved user experience. By using this Site you consent to the deployment of cookies. You can control and manage cookies using your browser (see below). Please note that removing or blocking cookies can impact your user experience and some functionality may no longer be available.

12.2. We only set a few cookies ourselves, but when we include content from other websites (like Facebook or Twitter) they also get the opportunity to set cookies, to help them serve their content better. [We cannot guarantee that we will have listed every cookie you might get from a third party, as

they can change them at any time as their needs change]. The main types and categories of cookies used by our Site are set out below.

12.3. Types of cookies:

12.3.1. Session cookies: these cookies remain in your browser during your browser session only, i.e. until you leave the Site.

12.3.2. Persistent cookies: these cookies remain in your browser for a set period of time after the browser session (unless deleted by you).

12.4. Categories of cookies:

12.4.1. Strictly Necessary Cookies: These cookies are fundamental to website functionality and cannot be switched off without blocking features on the Site. They are usually set in response to your actions on the Site, such as filling in forms, setting preferences, or recognize the user as valid and authenticated while accessing protected areas of the Site.

12.4.2. Analytics cookies: GEMS collects information about how you use our Site including details such as the website that referred you (e.g. search engines, marketing campaigns, referring domains), the content you viewed, the Site path you navigated and the links that you clicked on. This is in order to understand your interests on our Site and the number of times you visit our Site. We use this information to improve our Site and enhance visitor experience. We share this information with analytics and search engine providers that assist us in improving and optimising our Site.

12.4.3. Preference cookies: GEMS uses preference cookies also known as “functionality cookies,” to allow our Site to remember the choices you have made in the past (such as your username, language or the region you are in) and provide you with an enhanced more personalised experience.

12.4.4. Advertising cookies: GEMS may present ads to you on websites that are not owned or operated by GEMS to promote GEMS services. The cookies are used to make advertising messages more relevant to you and your interests. They also perform functions like preventing the same ad from continuously re-appearing. These advertisements are solely intended to make you aware of relevant GEMS promotions. GEMS does not sell your data to any third parties. Please see our Privacy Policy for more details.

12.5. You don't want cookies?

12.5.1. Whether the Site is able to set cookies depends on a setting in your web browser. By visiting the Site with cookies enabled, you consent to our use of cookies. If you wish to disable cookies, you can find instructions on how to do so for various popular web browsers by following the links below:

12.5.2. Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

12.5.3. Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

12.5.4. Chrome: <http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

12.5.5. Safari: <https://support.apple.com/en-ae/guide/safari/sfri11471/mac>

12.5.6. Microsoft Edge: <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy>

12.5.7. If you use a different web browser, please contact the browser maker for instructions on disabling cookies. Please note that, if you disable cookies in your browser, some aspects of the Site, and of other websites, may stop working.

13. CONTACT US: Please talk to us

13.1. If you have any queries, comments or complaints regarding the Site or this Privacy Policy, just get in touch. You can contact us via the contact us section of the Site or write to us at:

The Webmaster

GEMS Corporate Office

Sheikh Zayed Rd. - Al Quoz 3

P.O. Box 8607

Dubai, UAE

For data protection related queries, please contact us on: dataprivacy@gemseducation.com

For any other queries, please contact us on: digital@gemseducation.com

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