



PRIVACY NOTICE FOR WEBSITES

Introduction

ISM values your rights to privacy and acknowledges the confidentiality of the personal information that you have provided to us directly and voluntarily. This Privacy Policy Statement explains why we collect your information, how it is intended to be used, to whom your information may be transferred, how long we keep it and how it is protected. It also advises you on how to access and amend your information, or ask for it to be expunged.

Why do we collect your personal data?

It is important that ISM collects, uses, processes, and retains your personal information when it is reasonable and necessary for a declared and specific purpose.

For Employment:

- To evaluate your capacity for employment;
- To communicate with you about your application;
- Once hired, to process your data to assess, *inter alia*, payroll, benefits application, allowances and refunds processing, tax processing, retirement benefits, and other such purposes;
- Once hired, to evaluate your performance and career development and,
- Upon separation, to process preparation of final payout.

For Parents and Students:

- To facilitate an immediate response to your inquiry and arrange a school tour;
- To assess your priority status as determined by the parameters of the ISM admission policy
- To evaluate students' suitability for our academic program;
- To complete application requirements, including medical assessment, campus ID, school account, uniforms, educational materials, shuttle service, school activities and trips, and school facilities access;
- To provide parents with a billing account within the school's system and access to school facilities;
- Once enrolled, to evaluate the student's achievement and behavioral data to support the faculty in developing an educational program that best meets the student's needs such as, but not limited to, academic teaching, guidance counseling, extra-curricular activities, learning support, and academic and non-academic recognition; and,
- Upon withdrawal or graduation of the student, to process data for the exit clearance and finalization of school records.

For Alumni:

- To provide updates about ISM's programs, marketing initiatives, promotions, events, and fundraising activities.



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And in general,

- To comply with ISM’s obligations under law and as required by government organizations and/or agencies such as, but not limited to, the following: NPC, BIR, HDMF or Pag-IBIG, PhilHealth, SSS and so on;
- To comply with legal and regulatory requirements or obligations;
- To comply with the requirements of audit and privacy compliance assessments/review; and,
- To perform such other processing or disclosure that may be required under law or regulations.

How and what type of personal data do we collect?

Collection of personal data will come from the application forms you submitted to us in our website, as well as, the other requirements that we might ask you to provide to us through our school official email, superintendent@ismanila.org, admissions@ismanila.org for inquiry and admission, and hr@ismanila.org for employment application. The types of personal data we will collect depend on the particular purpose and/or position for which you are submitting an application. Common types of data we generally collect include the following:

- Basic personal information such as full name, nickname, home address, e-mail address, telephone and mobile contact details, and username and password;
- Sensitive personal information such as age, date of birth, nationality, occupation and gender; and,
- Other sensitive personal information and records such as, but not limited to, the following:
 - Photo,
 - Educational background (i.e. transcript of records, letters of recommendation from previous schools),
 - Employment records,
 - Medical records,
 - Family background,
 - Spouses and children’s name
 - Financial details
 - Valid identification cards and licenses,
 - Current salary, basic pay, statutory obligations such as HDMF or Pag-IBIG, SSS, PhilHealth and withholding tax, and other benefits.

Please note that you are responsible for ensuring that personal data you submit to us are accurate, complete, and up-to-date.

Who do we share your personal data with?

As a general rule, we are not allowed to share your data to third party except in limited circumstances as noted below.

By giving your consent, you authorize ISM to disclose your personal data to accredited/affiliated third parties or independent/non-affiliated third parties, whether local or foreign in any of the following circumstances:

- As necessary for the proper execution of processes related to the declared purposes in this Privacy Policy.



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- The use or disclosure is reasonably necessary, required or authorized by or under law (such as for criminal investigation, as requested by court of law).

This means we might provide your personal data to the following:

- Our affiliates, subsidiaries, partner companies, organizations, or agencies including their sub-contractors or prospective business partners that act as our service providers and contractors;
- Law enforcement and government agencies;
- All third parties, as noted in Annex A, with whom we share this personal data are required to use your personal data in a manner that is consistent with this Privacy Policy.

However, these companies may only use such personal data for the purpose(s) disclosed in this Privacy Policy and not for any other purpose.

How do we protect your personal data?

We take all reasonable steps to ensure that personal data we collect, use or disclose are accurate, complete, and up-to-date. We strictly enforce our Privacy Policy within ISM, and we have implemented technological, organizational and physical security measures to protect your personal data we hold from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. We put in effect these safeguards:

- We keep and protect your personal data using a secured server behind a firewall, deploying encryption on computing devices and physical security controls.
- We restrict access to your personal data only to qualified and authorized personnel who hold your personal data with strict confidentiality.
- Any personal data that you provide on our website is initially processed and stored by ISM. Using a secured connection, only authorized ISM personnel can then access and download your personal data from ismanila.org.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign-off when you have finished using a shared computer.

Where and how long do we keep your personal data?

ISM reserves the right to retain your personal data whether in our files located in the Philippines or in cloud servers, or in under certain circumstances such as when your personal data may be necessary to resolve disputes, or if ISM is required to do so by law or in the good faith; provided that such action is necessary to comply with a legal obligation and/or protect and defend the rights or property of ISM. If ISM is required to retain any portion of your personal data for such purposes, it shall use reasonable efforts to limit such data to what is necessary to accomplish the particular purpose.



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Amendments in our Privacy Notice

ISM reserves the right, at any time and without notice, to add to, change, update, and modify our privacy notice, simply by notifying you of such change, update or modification. If we decide to amend our privacy policy, those amendments will be immediately reflected in the privacy notice in our website in order to timely notify you of what information collect, how we use the information, and under what circumstances the information is disclosed. ISM recommends that you periodically check our Privacy Notice to keep you updated.

Use of Cookies

This website engaged Finalsite, a third-party service, to analyze the web traffic data for us. This service does use cookies.

The site may use “cookies,” (small information files) to enhance user experience. A web browser stores cookies on a user’s hard drive for record-keeping purposes; e.g., cookies help a website determine if a user is a returning or first-time visitor. A user may choose to set their web browser to refuse cookies, or to send alerts if cookies are being sent.

The information collected will be used for compiling aggregate statistics on how our visitors reach and browse our websites to help us understand how we can improve your experience on it. Such information is collected anonymously and you cannot be identified unless you have logged on as a member. The information collected includes the following:

- Your IP addresses (and domain names),
- Browser software,
- Types and configurations of your browser,
- Language settings,
- Geo-locations,
- Operating systems,
- Referring website,
- Pages and content viewed; and,
- Duration of visits

Most web browsers are initially set up to accept cookies. If you do not want to receive cookies, you can disable this function in your browser settings. However, by doing so you may not able to fully enjoy the benefits of our websites and certain features may not work properly.



Date: **December 15, 2017**

Document No.: **ISM-DPM-2017-003**

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How you can access, correct and update the personal data we have about you?

To exercise your rights, including the right to access, modify and erase your personal data, or should you have any inquiries, feedback and/or complaints to ISM, you may reach us through our contact details below:

*International School Manila
University Parkway, Fort Bonifacio, Taguig City 1634, Philippines
Office: (632) 840-8400
Email address: superintendent@ismanila.org*

If your request was not granted, or if you feel your request was not sufficiently addressed, or if you feel that your personal data you provided to us has been misused, maliciously disclosed, or improperly disposed, or that any of your data privacy rights have been violated, you may file a formal complaint with the National Privacy Commission (NPC). Before doing so, however, we recommend that you inform us of your intention to complain to the NPC.

Our decision to provide such access or consider any request for correction, erasure and objection to process your personal data as it appears in our records will be subject to any exceptions under applicable and relevant laws and/or the DPA, its IRR and other issuances of NPC.



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Consent

In order to comply with a new government law on data privacy, we are now obliged to ask for parents' permission to collect, process and store all personal data. When you tick the box below, you are giving formal consent for this to happen.

- Yes – I give my consent to ISM to process my personal information and sensitive personal information for the purpose(s) described in this <Privacy Policy>.**
- No – I do not give my consent to ISM to process my personal information and sensitive personal information for the purpose(s) described in this <Privacy Policy>. I understand that this effectively rescinds my application.**



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Annex A: List of third party/-ies to which we share your personal data

Ref	Name of third-party	Purpose(s) of data sharing	Categories of personal data shared	Intended recipients
1	T-Shuttle Services, Inc.	Transportation	Transport service & emergencies	ISM Faculty & Staff