

GDPR Information for Students and Parents in connection with measures during the COVID-19 epidemic

The American School of Warsaw with its registered seat in Bielawa, ul. Warszawska 202, 05-520 Konstancin-Jeziorna (hereinafter referred to as the “**Controller**” or the “**School**”), using the website www.aswarsaw.org, informs that:

1. Pursuant to the provisions of the GDPR¹, the School is the controller of parents’ and students’ personal data as previously authorized and collected in connection with special measures implemented due to the existing state of epidemic of COVID-19.
2. The School will process the following categories of data (hereinafter the “**Personal Data**”):
 - a) students’ body temperature;
 - b) students’ health-related data, in particular positive results of tests performed at the request of the School by EpiXpert Sp. z o.o. with its registered seat in Warsaw (the “**Service Provider**”);
 - c) students’ status in the ok4School application of the Service Provider i.e. able/unable to enter the School premises;
3. The Personal Data specified in point 2 (b) and (c) above has been provided to the School by the Service Provider.
4. The Personal Data will be processed to protect life and health of the School’s students and employees against the risk of contracting SARS-CoV-2.
5. The basis for processing Personal Data will be:
 - a. the reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health (art. 9 sec. 2 i) GDPR);
 - b. your consent (art. 9 sec. 2 a) GDPR).
6. You may withdraw your consent to data processing at any time. Consent withdrawal shall not affect the legitimacy of the processing carried out before the consent was withdrawn. However, withdrawal of your consent may make it impossible to provide services under the terms of the enrolment contract.
7. Personal Data may be shared with authorized bodies and institutions, in particular sanitary authorities on the basis of applicable regulations, as well as IT service providers, cloud server providers (e.g. Microsoft Azure) or other entities, as required by legal regulations.
8. The School shall not share and does not intend to share Personal Data with third countries (outside the European Economic Area) or international organizations.
9. The School will retain Personal Data specified in point 2 (a) above for 1 day from the date it was collected by the School. The School will retain Personal Data specified in point 2 (b) and (c) above for the period of 1 month from the date it was collected by the School.
10. The School shall not take any automated decisions, including decisions resulting from profiling, on the basis of Personal Data.
11. You have the right to demand that the School provides you with access to Personal Data, the right of rectification or erasure of Personal Data, the right of restriction of processing and the right to lodge a complaint against data processing, as well as the right of data portability.
12. If you believe that the School processes Personal Data in breach of the personal data protection regulations, you have the right to lodge a complaint to the President of the Personal Data Protection Office.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC