

GEMS – Privacy Policy

GEMS World Academy SA (« GEMS »), having its registered office at La Tulière 18, 1163 Etoy, is committed to protecting your privacy. This Privacy Policy (the “Privacy Policy”) explains how we collect and use your personal data and which rights and options you have in relation with the data we process. Additional provisions contained in the contractual agreements we may have with you may supplement this Privacy Policy and form an integral part of the privacy policies. In case of contradictions and discrepancies between this Privacy Policy and any other additional provision, the latter shall override the provision of this Privacy Policy with which it is in conflict.

This Privacy Policy is addressed to:

- our prospective, current and former pupils as well as their parents, legal guardians and/or other family members;
- our website’s visitors and any third parties following our company such as individuals having registered for our newsletter, events or other information mailing;

GEMS is responsible for the processing of your personal data as it decides why and how it is processed, thereby acting as the “**controller**”.

1. *What type of personal data do we collect?*

1.1. **Prospective, current and former pupils, their parents, legal guardians and/or other family members**

For our prospective, current and former pupils, their parents, legal guardians and/or other family members we may collect the following information:

- identification information such as name, title, position, company name, address (incl. city, country, zip code), phone number, email address, signature, digital signature, date and place of birth, nationality, ID card or passport numbers and copy of ID card, contact person in case of emergency;
- family information (e.g. marital status, number of children, date of birth and household composition, working status of the spouse);
- all information related to the prior education of prospective or current pupils;
- all information collected in the context of the educational services we provide (e.g. report cards, attendance records, papers, recordings);
- information regarding dietary preferences of the pupils; and
- any other information which you may provide to us (e.g. information you provided by filling forms, provided during our meetings or correspondence).

In addition, we may also collect special categories of personal data. You will be informed separately of the intended collection and processing of such information is subject to your explicit consent.

1.2. Website's visitors and any third parties following our company such as individuals having registered for our newsletter, events or other information mailing

For our website's visitors and any third parties following our company such as individuals having registered for our newsletter, events or other information mailing, we may collect the following information:

- Information that you provide by filling in forms on our website, including information provided at the time of registering to use our site, subscribing to a service, posting material or requesting further information or services. We may also ask you for information if you report a problem with the Site;
- If you contact us, we may keep a record of that correspondence;
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- Details of any transactions you carry out through the Site or otherwise and of the fulfilment of your orders; and
- We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration purposes and to help us improve the Site. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

2. How do we collect your personal data?

We collect your personal information in the context of our admission process and educational services, or when you provide it to us, or interact with us directly, for instance engaging with our staff or registering on one of our digital platforms or applications. The information may also be obtained from publicly available sources (e.g. social media profiles).

We collect your personal information while monitoring our technology tools and services, including our websites and email communications sent to and from us.

We may collect or receive information about you from other sources, such as keeping the contact details we already hold for you accurate and up to date using publically available sources.

3. Personal data about other people which you provide to us

If you provide personal data to us about someone, you must ensure that you are entitled to disclose that personal data to us and that, without us taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Policy. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

4. For which purposes do we process personal data?

We may use your personal data for the following purposes only:

- To register your application on our website;
- To ensure that the Site is presented in the most effective manner for you and for your computer;
- To allow you to participate in any interactive features of the Site, when you choose to do so;
- To notify you about changes to our service;
- Because the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request; provide services you may have requested;
- To comply with our legal and regulatory obligations, including court orders and exercises and/or defend our legal rights, reporting to and/or being audited by regulatory bodies, record keeping obligations;
- To analyse and improve our services and communications to you;
- To protect the security of and to manage access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us; and
- Because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

Where you have expressly given us your consent, we may process your personal data also for the following purposes:

- To send you relevant news;
- To occasionally carry out surveys to ensure that we are providing you with what you are interested in; and
- To check whether you are eligible for a competition and to contact you if you win.

5. How do we protect your personal information?

We will take appropriate technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

If you provide us with personal data over the Internet, you should be aware that data transmission via this medium cannot be guaranteed to be 100% secure. While we will take all reasonable efforts to protect such

personal data, you acknowledge that we cannot ensure or warrant the security of any personal data provided by these means and you provide it to us at your own risk. Once received, we have appropriate technical and organisational security measures in place to protect the data that resides on our servers. However, we do not warrant the security of our servers, nor do we warrant that the Information will be completely secure or not be intercepted while being transmitted over the Internet.

If you are provided with a user identification code, password or any other piece of information as part of our security procedures for a registration-only section of the Site, 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. You agree to Contact Us immediately 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 these terms or the Terms and Conditions of use of the Site.

6. Whom we share your personal data with?

6.1. Transfers to third parties

We may transfer or give access to personal data to third parties outside GEMS to complete the purposes listed below, to the extent they need it to carry out the instructions we have given to them. Such third parties may include:

- affiliated companies of the GEMS group;
- third parties who process personal data for us, such as our our (IT) systems providers, website designers and hosting provider, payment services providers, banks, insurances companies and pensions funds, social security bodies, event organisers, email delivery service providers, database and cloud providers and consultants;
- our advisors and external lawyers;
- third parties to whom you specifically requested to transfer data; and
- any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

The above third parties are obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

6.2. Transfers outside Switzerland or the European Economic Area

The personal data transferred by GEMS may also be processed in a country outside of Switzerland and of the European Economic Area ("EEA"), which covers the EU Member States, Iceland, Liechtenstein and Norway. Such country may not offer the same level of personal data protection as Switzerland or EEA countries.

If your personal data is transferred outside Switzerland or the EEA, we will therefore put in place suitable safeguards, in particular standard or ad hoc contractual clauses, to ensure such transfer is carried out in

compliance with the applicable data protection rules. You may request additional information in this respect and obtain a copy of the relevant safeguard by exercising your rights as set out below.

7. How do we use cookies and other similar technology on our websites?

7.1. What are cookies?

We use "cookies" to store and collect information regarding your use of our site. Cookies are small pieces of information stored by the browser on your computer's hard drive. They send the information stored on them back to our web server when you access our site.

These cookies enable us to load the site in such a way as to reflect your personal preferences (based on your previous browsing on gemseducation.com as well as keywords we may be able to gather from the URLs of webpages from which you accessed our Site, your IP address and any search engine used to reach us).

We use these cookies to improve your experience and recommend content that may be of interest to you. You can find out more about cookies at www.allaboutcookies.org and more about the cookies we use below.

7.2. What cookies do we use?

We only set a few cookies ourselves, but when we include content from other sites (like Facebook or Twitter), they also get the opportunity to set cookies, to help them serve their content better. We can't guarantee that we'll have listed every cookie you might get from a third party - they can change them at any time as their needs change. Here are the main cookies used by gemseducation.com

7.3. Cookies for Measuring Web Traffic

The Site uses cookies of a kind commonly referred to as "analytics cookies". We generally use the tool from Google called Google analytics which helps us to understand how many people visit our Site, how often people return to the site, how long they stay, and where on gemseducation.com they tend to go. We use this to try to work out what kind of experience you're having on the site, so we can make it better. These cookies do not allow us to identify you personally. If you would like to read Google's privacy policy please click here.

7.4. Cookies From Social Networks

Because GEMS Education and GEMS Schools and education initiatives are active on various social networks, we try and make it as easy as possible to share content and to see what content is popular on those networks. For that reason we may include recommendations from Facebook, tweets from Twitter, content from Google+ and add buttons to allow people to easily share to those networks.

When we include these social 'plugins', it gives those sites the flexibility to use cookies. If you haven't visited these sites, no cookies will be added.

For more information about how Facebook uses cookies, please see their support site <http://www.facebook.com/help/445588775451827>.

You can read more about how Twitter users cookies in their privacy policy <https://twitter.com/privacy>

For more information about 'Add This', see their privacy policy <http://www.addthis.com/privacy/privacy-policy#.UjdI8cacr6M>

For more information about the Google +1 button, see their privacy policy http://www.google.com/intl/en_uk/+/policy/+1button.html

7.5. Cookies for Content

We often include content from other sites in our updates, most notably YouTube videos. When we do this, YouTube may store cookies in order to track how people are watching videos from their site.

For more information about YouTube privacy policy <https://www.youtube.com/user/googleprivacy>

7.6. You don't want cookies?

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:

- Firefox
(<http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>)
- Internet Explorer 7 and 8
(<http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>)
- Internet Explorer 9
(<http://windows.microsoft.com/is-IS/windows7/How-to-manage-cookies-in-Internet-Explorer-9>)
- Chrome
(<http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>)
- Safari
(<http://support.apple.com/kb/PH11913>)

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.

8. For how long do we retain your personal data?

Your personal data will be deleted when it is no longer reasonably required for the permitted purposes or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. We will, in particular, retain your personal data where required for GEMS to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

9. What are your rights regarding your personal data?

Subject to certain legal conditions, you have the right to request a copy of the personal data about you which we hold, to obtain the erasure of personal data, to have any inaccurate personal data corrected and to object to or restrict our using your personal data, by sending an email to dataprotection_gwe@gemsedu.com

If you object to the processing of your personal information, or withdraw your consent previously given, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by sending an email to dataprotection_gwe@gemsedu.com

10. Updates to this Privacy Policy

This Privacy Policy was last updated in May 2018. This Privacy Policy may be subject to amendments. Any future changes or additions to the processing of personal data as described in this Privacy Policy affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you. The changes will take effect as soon as they are posted on this website.

11. How to get in touch with GEMS?

We welcome your views about our website and our Privacy Policy. If you would like to contact us with any queries or comments, please send us an email to dataprotection_gwe@gemsedu.com