



Data Protection Plan

Academic Year 2026 – 2027

1. Purpose

This Data Protection Plan outlines the framework adopted by Belvedere British School (BBS) to ensure the protection, confidentiality, integrity, and lawful processing of personal data of students, parents, staff, and stakeholders in compliance with UAE Federal Decree Law No. (45) of 2021.

2. Scope

This plan applies to:

- All personal data processed by BBS
- All staff, contractors, and third parties with access to school-managed personal data
- All forms of data (physical and digital)

3. Definitions (as per PDPL)

- **PDPL:** Personal Data Protection Law
- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Sensitive Personal Data:** Includes data relating to health, ethnicity, religion, biometric, and children's data.
- **Data Subject:** The individual to whom the personal data relates.
- **Data Controller:** The entity that determines the purpose and means of data processing (BBS).
- **Data Processor:** A third party that processes data on behalf of the controller.

4. Legal Basis for Processing Personal Data

BBS shall process personal data:

- With the explicit consent of the data subject or legal guardian
- As necessary for contractual obligations (e.g., admissions, employment)
- In compliance with legal obligations
- To protect the vital interests of the data subject
- When required for the public interest or educational necessity

5. Data Collection and Use

BBS collects and processes the following categories of personal data:

- **Student data:** Name, DOB, address, academic records, health records
- **Parent/Guardian data:** Contact details, IDs, consent forms
- **Staff data:** Employment history, qualifications, payroll information
- **Operational data:** CCTV footage, visitor logs, email communications

All data is collected for specific, explicit, and legitimate purposes.

6. Consent Management

- Written parental/guardian consent is required before collecting or using a child's personal data.
- Consent must be freely given, specific, informed, and unambiguous.
- Withdrawal of consent is respected and processed within 5 working days.

7. Data Subject Rights

BBS upholds the following rights for data subjects:

- Right to access and obtain a copy of personal data
- Right to rectification or erasure of data
- Right to object to or restrict processing
- Right to data portability
- Right to withdraw consent
- Right to file complaints with the UAE Data Office

Requests must be actioned within **30 calendar days** of receipt.

8. Data Retention and Deletion

- Personal data will be retained **only for as long as necessary** to fulfil its purpose or to meet legal/regulatory obligations.
- Deletion will be secure and irreversible.
- A **Data Retention Schedule** is maintained in accordance with ADEK requirements.

9. Security and Confidentiality

BBS implements appropriate **technical and organisational measures** to protect data:

- Secure storage (password protection, encryption, access control)
- Restricted access on a **need-to-know basis**
- Staff training on data protection responsibilities
- Regular audits and monitoring

10. Third-Party Data Sharing

- Data shared with service providers (e.g., SIS platforms, cloud providers) is governed by **Data Processing Agreements**.
- All third parties must comply with the PDPL and BBS data protection standards.

11. Data Breach Notification

- Any personal data breach must be reported to the **Designated Data Protection Officer (DPO)** immediately.
- High-risk breaches will be reported to the UAE Data Office and affected individuals within **72 hours**.
- A **Data Breach Register** is maintained.

12. Data Protection Officer (DPO)

BBS has appointed a **Data Protection Officer** responsible for:

- Ensuring compliance with the PDPL
- Monitoring school-wide data protection practices
- Serving as the point of contact for data subjects and the UAE Data Office

13. Awareness and Training

- All staff undergo **annual data protection training**
- New hires receive orientation on data privacy as part of onboarding
- Awareness campaigns and refresher training are regularly conducted

14. Review and Updates

- This Data Protection Plan will be reviewed annually, ready for the start of each new academic year.
- Updates will be made as necessary to comply with legal changes or operational needs
- Stakeholders will be informed of significant changes

15. Contact

For questions or to exercise your data rights, contact:

BBS Data Protection Officer (DPO):

- **IT Officer** - i.t@belvederebritishschool.com
- **MIS Admin** - mis.admin@belvederebritishschool.com
- **Safety Officer** - healthandsafety@belvederebritishschool.com

Phone: 02-5090000/01

Review and Approval

Review Date: June 2026

Next Review Date: June 2027

Approved by:

Principal

BBS Board of Governors

School Stamp