

## Privacy Declaration

Trondheim International School (Organisation nr. 886847262), by Head of School, is responsible for the storage and processing of Personal Information in the organisation (hereinafter THIS).

This privacy declaration describes how THIS, as the Data Controller, handles personal information for employees, students and parents.

If you have questions about privacy at the school, you can contact office@this.no / tel. 73514800.

### Definitions

- **A person** is an identifiable physical person, such as a student, parent/guardian or an employee.
- **Personal Information** is information that is directly or indirectly related to a Person.
- **The Data Controller** is the person who defines the purpose for the processing of the Personal Information and who processes and stores the Personal Information.
- **A Data Processor** processes Personal Information on behalf of the Data Controller. The processing is regulated by a Data Processor Agreement between the Data Controller and the Data Processor.

Student and Parent/Guardian	Employee
<b>Personal information that is processed and stored is:</b>	
<ul style="list-style-type: none"> <li>● General Personal Information such as name, age, etc.</li> <li>● Contact details such as address, e-mail telephone number, etc.</li> <li>● Special categories Personal information (sensitive information) such as health information etc.</li> <li>● Assessments of students, such as mid-term assessments, diplomas, any need for adapted education, etc.</li> <li>● Information about absence, remarks, warnings, etc.</li> <li>● Information related to special educational support and teaching, including investigations, individual decisions and individual training plans.</li> <li>● Information related to the content of inquiries and other communication, such as e-mail, letter, SMS, etc.</li> <li>● Other information that is necessary for THIS to be able to fulfill its statutory obligations, such as social security numbers, leave, etc.</li> <li>● Photos, video and audio recordings. Given that you have agreed to this.</li> </ul>	<ul style="list-style-type: none"> <li>● General Personal Information such as name, age, etc.</li> <li>● Contact details such as address, e-mail, telephone number, etc.</li> <li>● Special categories Personal information (sensitive information) such as health information, union membership, etc.</li> <li>● Assessments when recruiting, after employee interviews, etc.</li> <li>● Personnel information such as employment contract, CV, certificates, holiday overview, warnings, etc.</li> <li>● Information related to the content of inquiries and other communication, such as e-mail, letter, SMS, etc.</li> <li>● Other information that is necessary for the School to be able to fulfill its statutory obligations, such as social security number, salary information, payment information, sick leave, leave, working hours registered in the time registration system, etc.</li> <li>● Profile pictures of staff on the school website, provided the consents have been given by individuals.</li> </ul> <p style="font-size: small;">Necessary information is obtained for board members in order to be able to perform the board duties, payment of fees and registration in the unit</p>

	register.
<b>Processing activities are:</b>	
<ul style="list-style-type: none"> <li>● Handle applications for school places and places on the after-school program (SFO).</li> <li>● Distribute information, news and invitations about, for example, the school's ongoing activities, events , gatherings, markets, etc.</li> <li>● Manage consents.</li> <li>● Exercise individual rights such as access, correction of information, etc.</li> <li>● Notify of changes in This services or contract terms, such as payment rates or opening hours.</li> <li>● Answer inquiries and inquiries related to the School's services, terms or processing of Personal Information.</li> <li>● Handle any disciplinary cases or the like.</li> <li>● Process any complaints.</li> <li>● Collaborate with relevant municipal services.</li> <li>● Other activities that are necessary for the students to have their right to education safeguarded within a safe and good framework.</li> </ul>	<ul style="list-style-type: none"> <li>● Recruitment and employment.</li> <li>● Manage the employee relationship in accordance with the employment contract and regulations.</li> <li>● Pay salaries and holiday pay.</li> <li>● Report salary, employer's contribution and tax.</li> <li>● Handle sick leave and leave.</li> <li>● Manage holiday settlement.</li> <li>● Process travel expenses and expenses.</li> <li>● Ongoing communication related to the employment relationship.</li> <li>● Handle any complaints, warnings and any disciplinary decisions.</li> <li>● Exercise individual rights such as access, correction of information, etc.</li> </ul>
<b>All Processing activities have a legal basis for processing, these are:</b>	
<ul style="list-style-type: none"> <li>● Specific requirements in the Education Act, the Independent Schools Act, the Foundations Act, the Public Access to Information Act, the Public Administration Act and other relevant laws with regulations.</li> <li>● To comply with the agreement on a place at the School or SFO.</li> <li>● Explicit consent.</li> <li>● Compliance with other legal obligations This is subject to, such as storage due to statutory rules for accounting matters.</li> <li>● To safeguard This legitimate interests (provided that the interests of Persons are safeguarded), for example in connection with defending a legal claim, to prevent loss or damage or to prevent actions that may compromise Persons' Personal Information.</li> </ul>	<ul style="list-style-type: none"> <li>● To comply with and manage your employment contract.</li> <li>● To comply with duties, requirements and rights in the Working Environment Act, the Independent Schools Act, the Public Access to Information Act, the Public Administration Act, the Tax Act, the Accounting Act and other relevant laws with regulations.</li> <li>● Explicit consent.</li> <li>● To safeguard This legitimate interests (provided that your interests are safeguarded), for example in connection with securing buildings, safeguarding security in the event of an accident or crisis, defending a legal claim, preventing loss or damage or preventing actions that may compromise Persons' Personal Information.</li> </ul>
<b>Individuals may at any time:</b>	

<ul style="list-style-type: none"> <li>● Withdraw consent for processing activities based on consent.</li> <li>● Access your Personal Information.</li> <li>● Correct their Personal Information.</li> <li>● Request the deletion of their Personal Information.</li> <li>● Ask for restriction of, or protest against processing.</li> <li>● Request the transfer of their Personal Information.</li> <li>● Terminate agreements in accordance with the agreement's provisions on termination.</li> </ul>	<ul style="list-style-type: none"> <li>● Withdraw consent to use profile pictures or publish contact information.</li> <li>● Access your Personal Information.</li> <li>● Correct your Personal Information.</li> <li>● Request the deletion of your Personal Information.</li> <li>● Ask for restriction of, or protest against treatment.</li> <li>● Request the transfer of your Personal Information.</li> </ul>
<b>Storage time</b>	
<p>This stores Personal Information for as long as is necessary to fulfill the Processing Purpose. Basically, information is deleted when a consent is withdrawn, a student has graduated from This or an agreement is terminated. Statutory rules and other legal obligations may make it necessary to store Personal Information for a longer period of time.</p> <p>As a publicly approved school, we are obliged to keep information about students that it may later be necessary to have access to. This applies to information that a Person has been a student at the school, absence, mid-term assessments and final assessments, grades and matters concerning rights and obligations to the content and organization of the education.</p> <p>Continued storage may also take place when necessary to safeguard This 'legitimate interests, such as enforcing or defending legal claims.</p>	<p>This retains Personal Information for as long as it is necessary to fulfill the Processing Purpose. In principle, the storage times below apply, but continued storage can take place when necessary to safeguard This' legitimate interests, such as enforcing or defending legal claims.</p> <ul style="list-style-type: none"> <li>● Information related to recruitment is deleted 6 months after the end of the probationary period.</li> <li>● Information related to employment such as CV, applications, certificates, diplomas, agreements, instructions, contact information, social security number, history of pay and sickness absence, and other ordinary information related to the personnel file is deleted 6 months after resignation.</li> <li>● Personal information related to accounting, such as time sheets, overtime registration, travel invoices, expenses, etc. deleted 10 years after the end of a given financial year.</li> <li>● Disciplinary decisions, suspensions, warnings and disciplinary sanctions are deleted after 5 years unless special new circumstances (e.g. new warnings or other non-compliance) suggest that it must be preserved longer.</li> <li>● Possible logs (access control logs, access logs on computer systems, other IT technical logs) are stored for up to 1 year.</li> <li>● Images with consent to use are deleted upon resignation.</li> <li>● Your email account and personal areas on the School's IT systems will be deleted within 6 months of resignation. The school nevertheless has the right to keep or copy emails that contain student information or information relevant to the school's operations or routines.</li> </ul>

### Information security

Protection of Personal Information is of great importance to This. We work continuously to safeguard security and protect Personal Information from unintentional alteration, deletion or disclosure to unauthorized parties, externally and internally. Our security routines include access and access control, data protection, IT systems and infrastructure, internal and external networks as well as school building and technical facilities.

## Transfer of Personal Information

No external third party may use Personal Information for its own purposes. This may disclose Personal Information to Data Processors who perform services for the School. The data processors will only use the Personal Information for the purpose for which they were collected and to perform the services for this. The relationship with such third party suppliers is regulated in Data Processor Agreements. Disclosure of Personal Information to public bodies occurs only in accordance with law and current regulations.

The school uses the following data processors, and has signed data processor agreements with them.

Data Processors	Used for	Information about
Visma Flyt Skole/Sampro	School administration and student administration	Students and parents/guardians
Økonomisenteret AS (regnskapskontor)	Accounting, payroll, invoicing	Students, parents/guardians and employees
Simployer/Capitech	Personnel administration / HR / time registration, HSE system, Deviation handling	Employees
AtB/CERT	School transport (Education Act § 7-1)	Students
Trøndertaxi	School transport (Education Act § 7-1)	Students
ManageBac	Organization of teaching, grade, assessment, contact between student / home and school	Students, parents/guardians and employees
Toddle	Organization of teaching, assessment, contact between student / home and school	Students, parents/guardians and employees
Edupage	Organization of teaching, timetables	Employees
Avonova	Occupational health service employees	Employees
Bibliofil	Lending of books from this school library	Students and employees
Google Workspace	Document processing and document storage	Students, parents/guardians and employees
Education Perfect	Learning platform	Students and teachers
Salaby	Learning platform in Norwegian	Students and teachers
Digilær.no - Udir	Mathematics learning	Students and teachers
Styreplan	Board administration	Board members, Board representatives and others that participate in Board meetings.

**Right of appeal**

If you believe that This 'processing of Personal Information is in breach of the privacy regulations, you have the right to submit a complaint to This directly, the Norwegian Data Protection Authority or another relevant supervisory authority.

**Modification of this privacy statement**

This reserves the right to change the privacy declaration at any time. The latest and current version of the privacy statement is available at any time on our website ([www.this.no](http://www.this.no)) or on request.