



Mercy Group of Schools

Student and Parent/Guardian Privacy Notice

Effective Date:28/0282024



Introduction

The Sisters of Mercy of Jamaica, British West Indies, operator of the Mercy Group of Schools (“**Sisters of Mercy**” / “**we**” / “**our**”), is committed to protecting the privacy and security of your personal data.

This privacy notice outlines how the Sisters of Mercy, through its institutions within the Mercy Group of Schools, will collect, use and disclose personal data. It applies to all current, former and prospective students of institutions within the Mercy Group of Schools as well as their parents and guardians.

It is important that you read and retain this notice, together with any other privacy notice or other communication we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using that data.

Data Controller and Data Protection Officer

As operator of the Mercy Group of Schools, the Sisters of Mercy is a data controller regarding the processing of your personal data for the purposes of the *Data Protection Act* (“**DPA**”).

Our details are outlined below:

Data Controller: **The Sisters of Mercy of Jamaica, British West Indies**
A corporation formed pursuant to the *Sisters of Mercy of Jamaica, British West Indies (Incorporation and Vesting Law,) 1954*
26 South Camp Road, Kingston 4, St. Andrew
876-618-2980

The institutions within the Mercy Group of Schools are: **Convent of Mercy Academy, Alpha Primary, Alpha Infant, Alpha School of Music, Alpha Vocational Training Centre, Jessie Ripoll Primary, St. John Bosco Vocational Training Centre and Mt. St. Joseph Prep School.**

We have appointed a Data Protection Officer (“**DPO**”) who is responsible for monitoring compliance with the DPA and assisting individuals with the exercise of their rights under the DPA.

You may contact the DPO regarding the handling of your personal information at:

Kimonia Herman-Howell
Sisters of Mercy Business Office
26 South Camp Road
Kingston 5.
876-353-1624
dpo@rsmjm.org



Personal Data We Hold About You

In summary, the term “Personal Data” for the purposes of this notice refers to any information relating to a person who can be identified from that information alone, or from that information and any other information that is in our possession or likely to come into our possession.

We may collect, store and use the following categories of personal data:

Students

- Personal information and contact details, such as name, gender, title, date and place of birth, nationality, address, email address, phone numbers and identification numbers
- Next of Kin, family and emergency contact information
- Copies of birth certificates and other identification
- Characteristics, such as language and height & weight
- Information about physical or mental health, including any medical conditions, medical records, sickness records and allergies
- Academic records, school reports and other performance & assessment-related information
- Attendance and absence records
- Behavioural and disciplinary information
- Special educational needs information
- Photographs and CCTV/video footage (including at school events)
- Information about the use of our IT, communications and other systems, and other monitoring information
- Other information obtained during the application and enrolment process and during the student’s time with the relevant institution

Parents/Guardians

- Personal information and contact details, such as name, gender, title, date and place of birth, nationality, address, email address, phone numbers & identification numbers
- Taxpayer Registration Number
- Copies of passport, driver's license and/or other forms of identification
- Occupation, employer and location of employment
- Next of Kin, family and emergency contact information
- Financial information
- Consents in respect of school-related activities
- Records, correspondence or notes arising from interactions
- Photographs and CCTV/video footage (including at school events)
- Information regarding guardianship, custody or access rights
- Other information obtained during the application and enrolment process and during the student’s time with the relevant institution

How We Collect Your Personal Data

Personal data will, most commonly, be collected directly from students, parents and guardians by way of admissions forms or collection on digital forms during the application and enrolment process, as well as during the course of your relationship with us.



We may also obtain personal data from teachers, previous schools, professionals (such as doctors), government entities (including the Ministry of Education and Youth) and other third parties.

How We Use Your Personal Data

We will only use personal data as permitted under the DPA and other applicable laws.

We collect and process personal data for a variety of purposes, and we rely on a number of legal grounds to do so. We will most commonly use student, parent and guardian personal data:

- For compliance with a legal obligation that we are subject to;
- To comply with the terms of a contract with the individual; or
- Where it is necessary for legitimate interests pursued by us or any third party to whom the data is disclosed, unless the processing is unwarranted by reason of prejudice to your rights and freedoms or legitimate interests.

In certain circumstances, we may also use personal data:

- Where we need to protect someone's vital interests;
- Where it is necessary for the administration of justice or the public interest; or
- Where we have the appropriate consent to do so.

Without limiting the above, we may use personal data for the following specific purposes and purposes that are compatible with same:

- To provide, administer and support our academic and extracurricular programs and activities
- For student selection and to confirm the identity of students, parents and guardians
- To administer examinations and other assessments and to publish the results of same
- To assess, monitor and report on student progress
- To assess the performance of our schools
- Managing our relationship with students, parents and guardians
- To process financial information for the payment of fees and other charges
- To facilitate relevant members of staff contacting you
- To safeguard students and members of staff within our schools
- To communicate with students, parents, guardians and former students
- To monitor students' electronic communications when using our systems
- To provide references and records for future education or employment
- The consideration and granting of awards, scholarships, prizes and bursaries
- To provide welfare and pastoral care
- To provide appropriate adjustments and accommodations for students with particular learning needs
- Complying with health and safety obligations
- To provide support to students after they leave our schools
- Complying with any legal or regulatory obligations applicable to us
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems
- To monitor compliance with our rules and policies
- To produce statistics, studies, reports and research for internal and statutory purposes



- For archival and historical purposes
- For certain direct marketing purposes, including bringing charitable and benevolent causes to your attention (where we have the appropriate consent to do so)

If we are not provided with certain personal data when we request it, this may impact our ability to enrol a student, to continue to permit a student to attend one of our schools or to provide other services, support or accommodations. We may also be prevented from complying with certain legal obligations applicable to us.

Sharing of Personal Data

We may share personal data with third parties in certain circumstances. The entities/persons that your personal data may be shared with include:

- Government departments and agencies
- Examination and external assessment providers
- Other educational, vocational or training institutions and organizations
- Financial institutions
- Insurance providers
- Professional advisors (such as lawyers or consultants)
- Third-party service providers who provide services to our schools regarding IT, telecommunications and data storage
- Healthcare, social and welfare organizations
- Past or prospective schools and/or employers

We will share personal data with third parties where required to do so by law, where it is necessary for the performance of our contract with you, where we have a legitimate interest in doing so or where there is another legal basis for such disclosure.

Personal data will primarily be shared with third parties in Jamaica. However, in some instances, personal data may be transferred outside of Jamaica in accordance with the DPA and any other applicable laws.

The list of specific entities with whom we may currently share personal data include those set out in the attached schedule. The extent to which personal data may be shared with these entities will depend on the institution attended by the student. Personal data may be shared with other entities and individuals where permissible under the DPA and other applicable laws, or where you have instructed us to share personal data with certain individuals/entities. We may revise this list and/or notify you of additional third parties with whom your personal data may be shared from time to time.

We require all third-party service providers to take appropriate security measures for the protection of personal data, and they may only act in accordance with our instructions in relation to such data.

Data Security

We have implemented appropriate security measures to prevent accidental loss and unauthorised use of your personal data. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a need to access such data. They will only process your personal data on our instructions and are subject to a duty of confidentiality.



We have also implemented procedures to address data breaches and will notify you of any breaches affecting your personal data where we are legally required to do so.

Expected Retention Period

We will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of compliance with legal, accounting or reporting requirements. The periods for which we will retain different types of personal data shall be determined on a consideration of:

- The nature and sensitivity of the personal data
- The potential harm that may result from misuse or unauthorised disclosure of the personal data
- The purposes for which we process the personal data
- Any applicable legal requirements

Having regard to the foregoing, we expect to retain the following types of personal data for these periods:

- Student Files (including personal and contact information of students, parents & guardians, student reports, evaluations, internal examination/assessment results and performance records) – 50 years from Date of Birth of the student
- Admissions Records (including application forms, assessments and records of decisions) – 50 years from Date of Birth of the student (or, if the student is not admitted, 2 years from date of the decision)
- Public Examination Results – 30 years from student leaving the school
- Attendance Registers – 7 years from date of last entry
- Parent/Student Emails on Servers – 2 years from student leaving the school
- CCTV Footage – 6 months from date of recording

The period for which we will retain any types of personal data not identified above will be based on a consideration of the factors outlined previously.

The period for which we will retain any personal data may be longer or shorter than the periods specified above depending on the particular circumstances of a given situation, the nature of the data in question, any applicable limitation periods and whether it is needed in connection with the exercise of our legal rights or the performance of our legal obligations.

Changes to Personal Data

We have a duty to ensure that the personal data we control and use is accurate and, where necessary, kept up to date. In the event of any changes to your personal data, you should immediately inform the DPO. We may invite you to review and update your personal data from time to time.

Changes to this Privacy Notice and Other Communications

We reserve the right to amend or update this privacy notice at any time, and you may be given a new privacy notice when substantial updates are made. If and when updates are made, we will provide you with notice of this and/or an updated copy of this notice as soon as reasonably practical. We may also



notify or communicate with you in other ways from time to time regarding the processing of your personal data.

If you have any questions regarding this privacy notice, please contact the DPO.

SCHEDULE – List of Entities to which Personal Data may be currently disclosed

1. Ministry of Education & Youth – 2 - 4 National Heroes Circle, Kingston (Tel: 876-922-1400)
2. Caribbean Examinations Council – 37 Arnold Road, Kingston 5, St. Andrew (Tel: 876-630-5200)
3. City & Guilds – Unit 15, 31 Upper Waterloo Road, Kingston 10, St. Andrew (Tel: 876-924-7804)
4. National Council on Technical and Vocational Education & Training – Gordon Town Road, Kingston 6, St. Andrew (Tel: 876-994-3278)
5. Zed Jamaica Limited (Renweb School Management System) – Unit 3 West, 39 Shenstone Drive, Kingston 6 (Tel: 876-880-3301)
6. Comsol (Jamaica) Limited (MySchool School Management System) – 158 Coconut Drive, St. Catherine (Tel: 876-615-2615)
7. Gradelogics.com (Gradelogics School Management System) – 715 Westgate Hills, St. James (Email: gradelogicsinc@gmail.com)
8. Open Solutions for Education, Inc. (OpenSIS Student Information Management System) – 225 Ted Turner Dr NW, Atlanta, Georgia 30303, USA (Tel: 1-281-673-6747)