

**COGNITA**

**Online learning and working  
SUPPLEMENTARY PRIVACY NOTICE  
FOR STAFF**

**October 2020**

**España**

**TEMS**

# THE ENGLISH MONTESSORI SCHOOL | ONLINE LEARNING AND WORKING SUPPLEMENTARY PRIVACY NOTICE FOR STAFF

## 1 INTRODUCTION

- 1.1 We are continuously committed to protecting and respecting the privacy of our parents, pupils and staff regardless of whether our provision of services is onsite or online.
- 1.2 We may consider it necessary or desirable to provide online education via our virtual learning programme (“**VLP**”). We may also choose to transition to a virtual working environment (“**VWE**”), with meetings and calls often being attended via video link e.g. on Google Meet.
- 1.3 Please read this supplementary privacy notice (“Supplementary Notice”) in conjunction with the Staff and Employee Privacy Notice. This Supplementary Notice (together with the Staff and Employee Privacy Notice) provide the basis on which we handle any personal data we collect from staff when taking part in our VLP and VWE.

## 2 USES MADE OF THE INFORMATION

### 2.1 VLE

- 2.1.1 To ensure that educational content is presented in the most effective manner, and our staff and pupil’s online experience is as appropriate as possible, if applicable for your role, you will be involved in our VLP. This will involve the processing of personal data, including in the following contexts:
  - 2.1.1.1 pupils participating in live, online, face-to-face interactive lessons and tutorials with other pupils and teachers;
  - 2.1.1.2 pupils participating in live video calls and tutorials with other pupils and teachers;
  - 2.1.1.3 online chat services;
  - 2.1.1.4 one-on-one sessions between teachers and pupils in specific cases for example for SEN, or for A-Level tuition;
  - 2.1.1.5 staff-to-staff interaction;
  - 2.1.1.6 peer review which includes teachers reviewing other teachers’ lessons for quality assurance;
  - 2.1.1.7 recordings of the remote classes being made by schools and stored on the VLP (“**Recordings**”); and
  - 2.1.1.8 Recordings being shared between Cognita schools in Spain.

### 2.2 VWE

- 2.2.1 To ensure that we can continue working in the most effective manner our VWE will involve:
  - 2.2.1.1 internal meetings with other staff, including across the group; and

2.2.1.2 external meetings with third parties such as suppliers and authorities.

### **3 BASIS OF PROCESSING**

3.1 We will use the information we receive to pursue the following legitimate interests which, in this context, includes the following purposes:

3.1.1 to deliver educational services to your child and other pupils and to comply with our obligations under the parent contract;

3.1.2 to comply with the Covid-19 containment measures ordered by the government authorities in the educational field, ordering the temporary suspension of the face to face activities, but the maintenance of educational activities through distance and online learning;

3.1.3 to promote the objects and interest of our schools and ensure the most efficient management of the schools;

3.1.4 to safeguard our children whilst they are taking part in the VLP;

3.2 We will need to carry out some of this activity undertaken via the VLP and VWE in order to fulfil our legal rights, duties or obligations – including those under a contract with its staff, or parents of pupils. The legal rights, duties or obligations include:

3.2.1 to perform the contract we have entered into with you; and

3.2.2 as is necessary for the purposes of carrying out our obligations in the field of employment law.

### **4 THIRD-PARTY SOFTWARE PLATFORMS**

4.1 We use third party software platforms including, but not limited to, Seesaw, Tapestry and Google Classroom, to facilitate our VLP and VWE; please also read the privacy notices, and applicable terms and conditions, provided by any such third parties. The third party notices will set out the data collection, use, and retention for the service they are providing. This supplementary notice only sets out how we use your data for the VLP and VWE.

### **5 HOW LONG WE KEEP PERSONAL INFORMATION**

5.1 The Recordings shall be retained by us for so long as the VLP and VWE is maintained by us and, thereafter, in accordance with our Retention Policy.

### **6 QUESTIONS**

6.1 If you have any questions about this supplementary privacy notice, please contact the Data Protection Team via [DPO@Cognita.com](mailto:DPO@Cognita.com).

### **7 CHANGES TO THIS POLICY**

7.1 We reserve the right to update this supplementary notice at any time, you will be notified of any material change.

**Dated 15 October 2020**

October 2020

