

SHANGHAI AMERICAN SCHOOL

Website Privacy Notice

Introduction

At Shanghai American School we value the rights and freedoms of all people. This includes respecting your privacy and protecting your personal information. This privacy notice describes how we collect and use (or "process") your information. It also tells you how to contact us as well as outlining what rights you have regarding your personal information.

Who are we?

Shanghai American School is a school located in Shanghai, China. We provide education to children between the ages of 3 and 18. We are a not-for-profit international school governed by a Board of Trustees and accredited by the Western Association of Schools and Colleges (WASC).

What is the purpose of this website privacy notice?

The purpose of this privacy notice is to provide detailed information about how we process personal data.

Our privacy notice should be read in conjunction with our other policies and terms and conditions which refer to personal information, including our

- Data Protection Policy
- Cookie Policy
- CCTV Policy

Please read this notice carefully and, if you have questions regarding your personal data or its use, please contact the Data Protection Lead by emailing dataprotection@saschina.org.

If you consider your personal data is not being used appropriately in accordance with this policy, you may contact us at dataprotection@saschina.org.

We will update this privacy notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

What is personal information?

The term *personal information* refers to any information which identifies you or can be used to identify a data subject when used in conjunction with other information.

The term *personal information subject* describes the person about whom the personal information is about.

What personal information do we collect about you?

We process personal information about visitors to our website; prospective, current and past: students and their parents; staff and contractors; donors and supporters; and other individuals connected with or visiting our school.

The personal information we process takes different forms. Examples include:

- names, addresses, telephone numbers, e-mail addresses, emergency contact information, passport numbers, national identification numbers, or other government-issued identifiers;
- IP addresses, location data, and website statistics and analytics;
- website cookies (see Cookie Policy);
- students' date of birth, nationality, family details;
- admissions, academic, disciplinary and other education related records, references, examination scores;
- parents' employment data;
- images, audio and video recordings;
- financial information and identification documents (e.g. for fundraising);
- employee and former employee data including recruitment, training, performance records, payroll, and other HR information;
- criminal records (*considered special category or sensitive in some jurisdictions).

As a school, from time to time we also need to process personal information which is designated as “sensitive” in order to facilitate our school operations and activities. Such information includes personal data regarding a data subject concerning:

- health;
- biometric data (e.g. fingerprints);
- religion;
- financial accounts;
- IP addresses and location data;
- special education needs;

- specially-designated status;
- information relating to safeguarding and child protection; and
- information of minors under 14

How do we use your personal information?

We process personal data in compliance with the Personal Information Protection Law and other applicable laws, ensuring security through appropriate policies and staff access controls.

Student records are maintained for educational and operational purposes, following strict procedures to ensure integrity and confidentiality. Required data is provided to school and government authorities as needed.

Information is shared with external organizations to support student needs, such as university admissions or school transfers. Limited contact details are shared with the PTSA Newcomers Committee to welcome new families, excluding academic or sensitive data.

Some key systems are managed by third parties (e.g., hosted applications, cloud storage). Data shared with these vendors is protected by security agreements and handled per our policies. If data is transferred outside of China, we ensure it meets legal requirements and receives an equivalent level of protection

Use of Photographs on the Website and Social Media

Photographs of Shanghai American School community members, including students, alumni, faculty, and staff, may be used on our website and social media sites. Shanghai American School respects the privacy of every constituent who accesses our website and social media properties, including but not limited to our accounts on Facebook, Instagram, LinkedIn, and WeChat.

Shanghai American School occasionally posts images on the website or social media sites of community members, particularly current students, teachers, and alumni. We do not post or permit constituents to post images that might be deemed inappropriate.

Shanghai American School will honor all requests by users who wish to have images of themselves removed from the website or social media sites. To make such a request, please contact communications@saschina.org. However, please be aware that Shanghai American School has no control over materials once they are posted online, and these materials may be copied or distributed without our knowledge or permission.

Purposes for which we process personal data

We process personal data to support our operation as an independent school. In particular, we use the data for:

- the selection and admission of students;
- the provision of education and enrichment to our students, including the administration of our curriculum and programs; monitoring student academic progress and educational needs; reporting on the same internally and to parents; registration and administration of external examinations, and providing references for students (including after a student has left);
- the provision of educational support and related services to students;
- the safeguarding of students' welfare and the provision of student support services, including wellbeing, school counseling, learning support, and health care;
- the provision of a safe and secure environment for students, staff, and visitors to the school;
- compliance with legal and regulatory requirements;
- operational management including the compilation of student records; the administration of invoices, fees and accounts; the management of school property; the management of security and safety arrangements (including the use of CCTV in accordance with our CCTV Policy) and monitoring of the school's IT and communications systems in accordance with our Code of Conduct (Staff) and Empowered User Agreement (Student); the administration and implementation of our school's rules and policies for students and staff; and the maintenance of historic archives;
- staff administration including the recruitment of staff/engagement of contractors; administration of payroll, benefits and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;
- advancement including fundraising;
- analyzing website traffic, demographics and behavior through the use of analytical tools and cookies;
- the promotion of our school through our website, marketing materials and other publications and communications (including through our social media accounts);
- maintaining relationships with our alumni and former employees;
- for keeping a record of historical and memorable events relevant to the maintenance of a historical record.

What rights do you have over your personal information?

Under data protection laws, you have the right to:

- obtain access to, and copies of, the personal data that we hold about you (subject to legal exceptions);
- correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data in certain circumstances;
- require us to restrict or refuse our data processing activities in certain circumstances;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another personal information handler;
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal;
- request that we explain personal information processing rules.

If you would like to exercise any of your rights under data protection law for which we are the personal information handler, please make your request by emailing us at dataprotection@saschina.org.

Please note that these rights are not absolute, and we may be entitled or required to refuse requests where exceptions or exemptions apply.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits.

We try to ensure that all personal information held in relation to an individual is as up to date and accurate as possible. Please notify the Human Resources Office (staff) or Admissions Office (families) of any significant changes to important information, such as contact details, held about you.

How do we retain and store your personal information?

All personal data is securely stored in accordance with legal requirements. We retain personal information only for legitimate purposes, relying on one or more of the lawful bases as set out above, and only for so long as necessary for those purposes, or as required by law.

Shanghai American School is committed to ensuring the safety of the website and its users. This site has security measures in place to protect all information under our control.

We continually monitor and update our security practices to maintain the integrity of our digital platforms.

Copyright and Intellectual Property

All materials on this site are copyrighted by Shanghai American School unless otherwise indicated. Shanghai American School will not post copyrighted material without written permission from the appropriate parties.

Shanghai American School provides links to other websites or resources. However, we do not control these sites and resources, do not endorse them, and are not responsible for their availability, content, or delivery of services. In particular, external sites are not bound by Shanghai American School's privacy policy, and users should review the policies of those sites independently.

Contact us

If you have questions, requests or issues, please let us know how we can help. Our Data Protection Lead can be reached at dataprotection@saschina.org.

Personal Information Handler Details

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