



**Phoenix House**  
International School

**Privacy Policy**  
Version 1.0

## Collection of Personal Data

Personal data provided by parents and staff to Phoenix House International School (PH) is used by the school to perform its administrative and educational functions. PH generally collects personal data through application forms, Google Forms, surveys and/or other channels. PH complies with all relevant legislation regarding data protection in Japan as well as the European Union's General Data Protection Regulation (GDPR).

## Data Collected

The types of data we collect may include, but are not limited to:

1. Name
2. Address
3. Birthday
4. Gender
5. ID/Passport details
6. Medical records & reports
7. Nationalities
8. Marital status
9. Phone number
10. Home address
11. Bank account payment and credit card information that is specified in connection with billing for tuition fees, etc.
12. Future enrolment or graduate school name
13. Information other than the above which may identify you (including video, audio, etc.<sup>1</sup>)
14. Attendance of lessons
15. Academic assessment and reports
16. Other schools you may be considering
17. Past and current academic records such as schools attended, courses of study, periods of study and academic results
18. Employment information such as company name, company type, sector, designation, business telephone numbers and email addresses

In addition to the above, all or part of the information that cannot identify you, but that can identify a particular individual by collating it with other information, will also be regarded as personal data.

## Use of Data

PH will use your data for purposes, including, but not limited to the following:

- Enrolment-related purposes (admissions assessment, registration, planning of curricula, communication with students and parents, provision of references, pastoral care, extracurricular activities and provision of healthcare services)
- Employment-related purposes (background checks, references, appointment, administration, human resource management matters including payroll, leave and benefits administration and staff development)
- Calculating statistical metrics relevant to the performance of PH
- School operation-related purposes including, where appropriate, marketing, document management, assessment and reporting
- Regulatory compliance-related purposes including, where necessary, provision of data to government educational authorities
- All other matters relating to the mission, function or operation of PH, as may be considered necessary and appropriate

## Storage of Data

Personal data will be kept confidential and handled only by PH staff members. We take necessary and appropriate measures for the safe management of personal information, and maintain and improve the safety measures within a reasonable range so as to restrict access to your information by a third party.

PH may disclose personal data collected for the purposes above to the following entities:

1. Entities to whom PH is compelled or required to provide data by law or in response to a request by a government agency, or where the public interest or PH interests so require
2. Third-party service providers providing services to PH whether in Japan or overseas

---

<sup>1</sup> Permission to use images, documents, photographs, videos of pupils for the school's publicity purposes, including the website, is sought when they join PH

3. Entities considered by PH to be necessary or appropriate for supporting the enrolment, education, safeguarding and wellbeing of PH pupils as well as for the operation of PH
4. Another school in which you will enrol, or your previous school,

And

5. When we determine that it is necessary to protect the life, body or property of our company, our community or third parties
6. If PH has the prior consent from the member(s) of our community whose personal data is to be disclosed

In the cases above where we entrust a third party to handle your personal data, we always conclude a confidentiality agreement with the outsourcee, confirm the safety of the information management system of the outsourcee, and perform necessary and appropriate supervision to enforce the agreement.

#### **Access and Correction of Data**

All reasonably practicable steps will be taken to ensure that the data held by PH are protected against unauthorised or accidental access, collection, use, disclosure, copying, modification, disposal or similar risks. All personal data you provide to the school are secured, and access to them is restricted to authorised personnel only.

You are able to request a copy of the administrative data held by PH about you, and to rectify outdated or erroneous data. We will respond to your request upon verification of your identity.

Date: May 2021