

## **Privacy Notice**

### **1. General**

This Privacy Notice sets out how XENION EDUCATION LIMITED, operating under its affiliated trade names XENION JUNIOR SCHOOL, XENION HIGH SCHOOL, XENION SUMMER FUN CLUB, XENION UNISTUDIES and XENION INSTITUTE (hereinafter referred to as "**Xenion**", "**Institution**", "**We**", "**Our**", or "**Us**") collects and processes personal data for the provision of services to its students (and their parents and/or guardians) ("**You**", "**Your**"). Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data.

This Privacy Notice includes all the information the Company, as controller under the law and the General Data Protection Regulation, Regulation (EU) 2016/679 ("**GDPR**"), has an obligation to provide you with, as data subject of the data it collects and processes.

Any questions relating to this Privacy Notice or requests in respect of personal data should be directed to the Data Protection Officer at [george@xenion.ac.cy](mailto:george@xenion.ac.cy)

### **2. Who We are**

Xenion Education Limited has been operating in the private education sector since 1980. For almost four decades we have been providing learning and teaching of the highest standards in our Language Institutes, our Primary School and High School.

Our main offices are located in Paralimni at 55 Xenion Education, 1<sup>st</sup> April Avenue, P.O. Box 33900 in Cyprus.

We strive to protect personal data and apply high standards of conduct when it comes to privacy issues. We ensure that its applicants are provided with the appropriate training in order to handle personal data securely and in accordance with the laws. Furthermore, we endeavor to ensure that any parties with whom we co-operate apply the same high standards when it comes to data protection and privacy as we do.

### **3. What services are offered through our website**

The services offered at our website include, but are not limited to, the following:

#### **a) Food Order Form**

You can use the food order form on our website to order your child(s) food for the day/week/month. The personal data that you filled out into the contact form will only be processed for answering your request. Filling in and submitting the form constitutes an affirmative action by which you have given your consent to the data processing.

#### **b) Online Payments**

You can use our online payment section and make a payment by visiting the [lunchbox.xenion.ac.cy/](http://lunchbox.xenion.ac.cy/). Without your personal data, we will not be able to process your payment. This online payment system is hosted through JCC Payments Systems, and your personal data will be processed for as long as it is necessary to fulfill any obligations towards us, including payment of your food order, except where we

are legally obliged to further store your data for the purposes of submitting it to public authorities, for example to tax authorities. This storage and transfer of your personal data to public authorities is based on fulfilling a legal obligation.

#### **4. What Information we collect**

Through our website you can order your daily/weekly/monthly food for Xenion Junior School students and you can make online payments for food orders. We will collect the following data during the registration/enrollment and online payment process:

- personal information such as the student's name, the date of birth, the place of birth, religion, gender, ethnicity and nationality, mother language and second language (if applicable) and the information of previous schools and valid email address (where and if applicable)
- contact details including the home address(local), the postcode and the mailing address (if for Cypriots and permanent residents) or address and contact telephone numbers in former country of residence, local address, local telephone number and mailing address (if students from abroad) and details of emergency contact (where and if applicable)
- any other information you may provide to us.

This data is collected for the purposes of optimizing and improving our website as well as our online services. The processing is legally based on legitimate interest as it is in our legitimate interest to protect our website and to improve the quality of our services. Additionally, your personal data is only stored if you provide it to us on your own account, e.g. as part of a registration, a survey, an online application or for online payment (performance of a contract). We have taken appropriate measures to ensure that the data provided to us during the registration is adequately protected. These measures include, but are not limited to, encryption, access control, segregation of duties, internal audit etc.

#### **5. Why we collect the information**

Here at the Institution we take your privacy seriously and will only use your personal information in accordance with our Personal Data Protection Policy, in order to communicate with you about our services and to improve the quality of our services.

The purposes for which we collect your personal information are as follows:

- a. To process your food order through the online registration form;
- b. To make an online payment of your food from our online payment portal;
- c. To obtain feedback from you that will help us to improve and/ or further the provision of our facilities and services.
- d. To communicate with you about our services that may be of interest to you.
- e. To communicate with you about products and/or services of our affiliates that may be of interest to you.
- f. To inform you about promotional events, special offers, etc.
- g. To enable us to perform our obligations towards you.
- h. To comply with a legal obligation to which we may be subject.
- i. Any other purpose specifically requested and/or agreed by you

Your personal information is processed and stored in our central offices located in Paralimni. It will be accessed only by our employees or contractors who are authorized to do so under a duty of confidentiality and only for the purposes stated above.

We do not collect any personal data other than that specifically mentioned above, and we do not use your personal data without your explicit consent unless you ask us to do so.

You do not have an obligation to provide us with your personal data, but if you don't, we will not be able to provide you with our services.

We do not carry out any automated decision-making activities, including profiling, using your personal information.

## **6. Recipients of your personal information**

Reasonable endeavors are made to ensure that data is only accessible by those with a need for access to fulfil the purposes set out above.

We use third party service providers process personal data in certain ways which are useful for the purposes of our services, such as **Dynamic Works** and **Noovopus**, which allow us to host the website, send you newsletters and company updates. These service providers are only allowed to process your personal data to the extent necessary to provide the services we have requested from them.

## **7. Retention of data**

The Institution retains personal data in accordance with the Data Retention Policy. Any personal data provided to us is retained to fulfil the purposes for which the data was collected, as stated in paragraph 5 above. After the fulfilment of the purposes for which the personal data was collected, such data will be destroyed, and a Destruction Certificate will be retained in our records, unless destruction is prohibited for legal, regulatory or technical reasons.

Any data kept by us for marketing and information purposes will be retained until you inform us that you no longer wish to receive such information.

Any requests for further information in relation to the continued processing of specific data and requests for destruction of data should be made to [dpo@xenion.ac.cy](mailto:dpo@xenion.ac.cy)

For further information on Our retention and destruction processes, please visit the Our Data Retention Policy at [dpo@xenion.ac.cy](mailto:dpo@xenion.ac.cy)

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## **8. Your rights**

Should you believe that any personal information we hold on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted by contacting us at [dpo@xenion.ac.cy](mailto:dpo@xenion.ac.cy)

In the event that you wish to complain about how we have handled your personal data, please contact us at [george@xenion.ac.cy](mailto:george@xenion.ac.cy) or in writing to our premises in Paralimni, Cyprus. We will then look into your complaint and work with you to resolve the matter.

In response to such requests, we reserve the right to require the individual making the request to provide certain details about himself/herself so that we can validate that the individual is indeed the person whom the data refers to. The Institution is required to respond to the request of the individual within 40 days and it will endeavor to do so wherever possible.

If you still feel that your personal data has not been handled appropriately according to the law, you can submit your complaint with the Office of the Commissioner for Personal Data Protection, at 1 Iasonos Street, 2<sup>nd</sup> Floor, 1082 Nicosia, tel. +357 22 818456, email address [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy).