

**Data Protection Policy**

**Privacy Notice**

What does CF School do with your personal information?

**Purpose of this notice**

This privacy notice provides information regarding our processing of personal data. If you are a natural person, this will affect you directly. In this privacy notice, the terms “we”, “us” and “our” refer to CF School(the school), and/or its delegates, unless the context otherwise requires.

The Data Protection Law, 2017 of the Cayman Islands (the “DPL”) gives our clients the right to limit some but not all sharing. The DPL also require us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. We do not disclose nonpublic personal information about our students or former students to third parties other than as described below.

**Personal information we collect**

By virtue of enrolling your child/children with our school, and through your associated interactions with us, you will provide us certain information that constitutes “personal data” under the DPL. We may also obtain Personal Data from public sources. Personal Data includes, without limitation, the following information relating to you and/or your child/children: name, residential address, email address, other contact information, gender, date of birth, nationality, basic health information and any relevant third party reports relating to the progress of your child/children for occupational, emotional or academic support. We also collect our own data regarding your child’s/children’s progress as a student at our school. Under the DPL, the school is a “data controller” and the school's non-affiliates and/or delegates may be “data processors” (or, in some circumstances, data controllers in their own right), in respect of your Personal Data.

**How we collect this information**

We collect this information from you through various means. For example when you register and enroll your child/children, give us contact information, information about your child’s special needs if applicable, information about the child’s living arrangements if applicable, tell us where to send money, or make a wire transfer in the case of a tuition refund.

**How we use this information**

We use the personal information we collect from you for our everyday business purposes.

These purposes may include for example:

• To provide education services to your child/children;

• To help coordinate extracurricular events or specialist care for your child/children;

• To comply with our legal or regulatory obligations.

**Disclosure to others**

We may share your Personal Data to certain third parties, including service providers that you appoint or engage to assist with extracurricular activities or occupational or academic support. In certain circumstances, we may be required by law or regulation to transfer your Personal Data and other information with respect to your enrollment at the school to governmental or law enforcement authorities. They may, in turn, exchange this information with other governmental and law enforcement authorities. We require all third-party service providers to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them.

**Transfer of your Personal Data outside the Cayman Islands**

Your Personal Data may be transferred to jurisdictions that do not have data protection laws equivalent to the DPL. This may be necessary for marketing reasons as we engage with an overseas provider to assist with the distribution of class newsletters.

**How we protect your Personal Data**

To protect your personal information from unauthorized access and use, we use security measures that comply with the DLP. These measures include computer safeguards and secured files and buildings. We require third parties to act only on our instructions and to implement appropriate technical and organizational measures against unauthorized or unlawful processing of your Personal Data and against accidental loss or destruction of, or damage to your Personal Data, consistent with the DPL.

**How long we retain your Personal Data**

We will retain your Personal Data for as long as we require it to perform our contractual rights and obligations or for our legitimate interests or for such longer period as required by our legal or regulatory obligations. In general, we will retain your Personal Data throughout your enrollment in the school. We will also retain certain elements of your Personal Data after you cease to be a student/parent at the school for historical enrollment analysis. As a general principle, we do not retain your Personal Data for longer than we need it.

**Your rights**

Under the DPL, you have certain data protection rights, including the right to request access to your Personal Data, the right to restrict the use of your Personal Data, the right to have incomplete or inaccurate Personal Data corrected, the right to ask us to stop processing your Personal Data, the right to require us to delete your Personal Data in certain circumstances and the right to complain to the Cayman Islands Ombudsman, who may be contacted by email (info@ombudsman.ky), telephone (+1 345 946 6283) or post (PO Box 2252, Grand Cayman KY1-1107, Cayman Islands).

**Automated decision-making**

We will not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your Personal Data, unless we have considered the proposed processing in a particular case and concluded in writing that it meets the requirements of the DPL (and other applicable laws).

This privacy notice relates to Clever Fish Ltd trading as CF School.