

ADUVIE INTERNATIONAL SCHOOL

PRIVACY POLICY

INTRODUCTION

This Privacy Policy is prepared in accordance with the Nigeria Data Protection Act (NDPA) 2023. It sets out how Aduvie International School ("we," "our," or "the School") collects, uses, and protects the personal data of our students, parents, staff, and other individuals who interact with us.

This policy applies to personal data collected through our website (https://aduvieportal.org), admission forms, and all other school operations.

1. WHO WE ARE

Aduvie International School is an educational institution dedicated to academic excellence and holistic student development. This Privacy Policy governs how we process personal data in the course of our educational and operational activities.

2. THE PERSONAL DATA WE COLLECT AND WHY

We only collect personal data that is necessary for specific, explicit, and legitimate purposes. The table below details the categories of data we process, why we need it, and the lawful basis under the NDPA.

Category of Data Subject	Types of Personal Data Collected	Primary Purpose for Processing	Lawful Basis for Processing (NDPA S.25)
Students	Full name, date of birth, address, medical & allergy information, academic records, photographs, behavioral reports, special educational needs information.	To provide a safe, tailored, and effective education; to safeguard student welfare; to administer the school.	Performance of a Contract (enrolment); Legal Obligation (safeguarding, education regulations); Vital Interests (medical emergencies).
Parents/Legal Guardians	Full name, contact details (phone, email), address, financial information for fee payment, identification documents.	To communicate about student progress & school activities; to manage the contractual relationship; to collect fees.	Performance of a Contract; Legitimate Interests (maintaining parent communication).

Job Applicants & Staff	CV, qualifications, references, national ID, bank details, tax information, performance reviews.	Recruitment, employment, payroll, and staff development.	Performance of a Contract; Legal Obligation (tax, employment law).
Website Visitors	IP address, browser type, cookie data (as per our Cookie Policy).	To operate, secure, and analyze the use of our website.	Consent (for non-essential cookies); Legitimate Interests (for essential security and functionality).

3. HOW WE USE YOUR INFORMATION

We will process the information you provide to:

- Fulfil our educational and contractual obligations to students and parents.
- Comply with our legal and regulatory duties (e.g., to the Ministry of Education, examination boards).
- Safeguard the welfare of students and staff.
- Manage our relationship with you and communicate effectively.
- Improve our services and website experience.

We will not use your personal data for unrelated marketing purposes without seeking your separate, explicit consent.

4. DATA SHARING AND DISCLOSURE

We may share your personal data with trusted third-party service providers under strict data processing agreements. These include:

- Educational Services: Examination boards (WAEC, NECO, Cambridge), e-learning platforms (Google Classroom, Moodle).
- **Operational Services:** Payment processors (Paystack), cloud storage providers, school management software vendors.
- **Legal & Regulatory Bodies:** As required by Nigerian law (e.g., Ministry of Education, law enforcement).

We do not and will not sell your personal data to any third party.

International Transfers: Where data is transferred outside Nigeria, we ensure adequate safeguards are in place as required by the NDPA, typically through standard contractual clauses.

5. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

- **Student Records:** Retained for a period of [e.g., 7 years] after a student leaves the school, in line with educational regulatory requirements.
- **Financial Records:** Retained for [e.g., 7 years] for audit and tax purposes.
- Job Applicant Data (unsuccessful): Retained for [e.g., 1 year] after the application process.

When data is no longer needed, it will be securely deleted or anonymized.

6. YOUR DATA PROTECTION RIGHTS

Under the NDPA, you have the right to:

- Access the personal data we hold about you.
- Rectify inaccurate or incomplete data.
- Erase your personal data (the "right to be forgotten").
- **Restrict** the processing of your data.
- **Object** to processing based on legitimate interests.
- **Data Portability**, where applicable.
- Withdraw Consent at any time, where processing is based on consent.

To exercise any of these rights, please contact our Data Protection Officer using the details in Section 9.

7. DATA SECURITY

We implement appropriate technical and organizational measures (including encryption, access controls, and secure servers) to protect your personal data against unauthorized access, alteration, disclosure, or destruction. While we strive to use commercially acceptable means to protect your data, we cannot guarantee its absolute security.

8. COMPLAINTS

If you have any concerns about our use of your personal data, you can make a complaint to us at the contact details below. You also have the right to lodge a complaint directly with the supervisory authority:

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Nigeria Data Protection Commission (NDPC)

Email: info@ndpc.gov.ng

Telephone: +234 (0) 9160615551

9. CONTACT US

For any questions about this Privacy Policy or to exercise your data rights, please contact our Data Protection Officer:

Data Protection Officer: Caleb Izuchukwu Nwogu

Email: caleb@aduvieinternationalschool.org

Telephone: +234 816 208 1221

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