



## GDPR - LIFP STUDENTS

(LFIP - Lycée Français International de Porto)

### Summary:

- A. LFIP Data Protection Policy
- B. AEFE Statement
- C. Image Use Policy

### A. CONFIDENTIALITY POLICY

The LFIP online platform is a data processing computer tool which allows the simplification of the administrative procedures concerning the schooling of the students who attend classes on our institution. With this in mind, we must ask for information necessary for the enrolment of students, for the renewal of enrolment, for transfers and for other usual procedures in educational institutions.

The LFIP and the company in charge of the EDUKA platform are committed to respecting a set of good conduct rules to ensure the respect of the confidentiality of your personal data.

- **Commitment to transparency:** we explain in detail, throughout this document, how your data are obtained, stored and processed.
- **Commitment to security:** technical and operational measures which comply with the sector standards are applied at all levels of information processing, whether it involves the collection, storage or recording of information.
- **Commitment to non-disclosure:** no data will be automatically disclosed to service providers or other third parties. Nevertheless, some information may be passed on to the companies we work with: Pronote (educational software), Sige (invoicing software), travel agency (for school trips), the company in charge of providing the services of meal preparation for the cafeteria, school transportation, extracurricular activities, and to the French Embassy (for school trips outside Portugal) and the Ministries of Education (French and Portuguese), only for the strictly necessary purposes.
- **Commitment to providing:** through your portal, you have features which allow access to your data, for consulting, correcting and deleting some personal information and for exporting the whole information. The contact details of the Data Protection Delegate are indicated on this document.
- **Commitment to comply with the law:** our platform complies with the existing legislation concerning the protection of your data, namely the General Data Protection Regulation which has been in force since the 25th May 2018.

#### 1. Collecting personal data

We collect the following information during the enrolment of students:

##### For the student:

- Name and surname
- Gender
- Place and date of birth
- Languages spoken
- Nationalities
- Identification of ID documents
- VAT registration no.
- Student's photo
- Health details

##### For the legal guardians

- Name and surname
- Family situation
- Email address
- Phone
- Address
- Nationality
- Languages known
- Profession
- Cartão de cidadão (ID card) and VAT registration no.

The personal information we request is collected through forms and thanks to the interactivity between each of you and our Web application. As indicated on the next section, we also use cookies and/or log files to collect information concerning your use of the platform.



## 2. Forms and interactivity

**Your personal data are collected through forms, namely:**

- Enrolment form for the application;
- Forms for enrolment, renewal of enrolment and transfer;
- Data update forms.

**We use the data collected for the following purposes:**

- Educational and administrative management of the students schooling;
- Contact between students and parents.

## 3. Log files and cookies

**We collect some information by using log files and cookies. This covers mainly the following type of information:**

- IP address during the enrolment;
- Pages visited and consulted;
- Access time and date.

**Using this type of files allows us to:**

- Improve our services and provide customised assistance;
- Define anonymous statistics.

## 4. Right of opposition and right of exclusion

We are committed to ensuring your right of opposition and of exclusion regarding your personal information.

**Right of opposition** means giving each user the opportunity to refuse his/her personal data being used for certain purposes indicated when the information was collected.

**The right of exclusion** allows each user to ask that the personal data are excluded from a mailing list of the LFIP, for example. In order to exercise these rights, you may send a letter or an e-mail to:

**Data Protection Delegate:** Sylvie Carbon  
Address: Rua Gil Eanes, 21, 4150-348 Porto  
E-mail address: [dpd@lfip.pt](mailto:dpd@lfip.pt)  
Telephone: 00 351 226 153 030  
Section: <http://lfip.edukasoftware.com/>



## 5. Right of access

We are committed to recognising the right of access and correction to the data subjects who want to consult, change or delete the respective information. To exercise this right, they may use the LFIP's platform or send a letter or an email to the people in charge of processing the data.

### People in charge of the administrative data processing for primary school students:

- Rosário Monteiro ([secretariat1.primaire@lfip.pt](mailto:secretariat1.primaire@lfip.pt)) Susana Gonçalves ([admission@lfip.pt](mailto:admission@lfip.pt))

### People in charge of the administrative data processing for junior and senior school students:

- Paulo Carvalho ([cpe@lfip.pt](mailto:cpe@lfip.pt))
- Susana ([admission@lfip.pt](mailto:admission@lfip.pt))

### Person in charge of the processing of health details:

- Celeste Gonçalves: ([enfermeira@lfip.pt](mailto:enfermeira@lfip.pt))

Address: Rua Gil Eanes, 21, 4150-348 Porto

Telephone: 00 351 226 153 030

Section: <http://lfip.edukasoftware.com/>

## 6. Safety

The data we collect are kept in a safe environment. The LFIP staff and the platform provider are required to respect the confidentiality of our information. To ensure the safety of your personal data, we use the following technical measures:

- Platform access through a safe connection (HTTPS);
- Access management: only authorised staff may consult the data;
- Network monitoring, intrusion detection and protection software against viruses and Trojan horses;
- Encrypted computer backups with a key known only by the person in charge of the platform and which can only be restored on the original platform;
- Your connection with our platform is protected by a combination of login/password and may be improved using a strong authentication method (email or temporary code);
- The server hosting the High School platform is protected by a hardware firewall and a software firewall.

We are committed to keeping a high standard of confidentiality, using the latest technological innovations which allow us to ensure the confidentiality of your transactions.

## 7. Legislation

We are committed to complying with the following legal provisions, at a technical level and at an organizational level:

- GDPR (General Data Protection Regulation), in force since the 25th May 2018 – (2016/679)
- National regulations

We also inform you that you have the right of complaint with the Comissão Nacional de Proteção de Dados (National committee for the protection of data).



## **B. IMAGE USE POLICY**

The General Data Protection Regulation (GDPR) defines as personal data a photograph which allows the identification of a person. Its use is subject to specific restrictions of consent by the person involved (or of his/her parents, if he/she is underage).

Advertising LFIP events with photographs and videos is an important part of our communication with the members of the school community, and because of this we think it is crucial to respect the consent for the distribution of the image of our users.

For this reason, after obtaining the authorisation or the prohibition, we will pay special attention to our publications so that we can fully respect the right of personal portrayal. Specifically, for example, instead of blurring a photograph which includes one student who has not given consent, we chose not to publish it.

There are many events which we like to share with our school community. Although we carefully manage all photographic and video material, there may be some exceptional and regrettable errors. If this occurs, we will correct such situation as soon as we know about it.

The dissemination of large-scale crowd images does not require authorisation (in this case, the law considers that the person's image is secondary), but even on such occasions we will make all efforts to have a respectful attitude towards the right of personal portrayal.

In order to ensure an effective reply to parents' requests, the consent for or the refusal of the distribution of the image of the student indicated on the Eduka file:

- may be changed at any time;
- concerns all the media/situations listed below; therefore, no intermediate (i.e. à la carte) consent is possible.

The photographs taken and the videos made during our school activities are allowed on the following situations:

- Class photographs
- Official LFIP Facebook page
- Newsletters
- Passport photo, school year book
- Exhibitions
- Illustration of LFIP events
- Contests...

The LFIP expressly forbids the use of visual resources which may affect the privacy or the reputation of any person.

Thus, although there are the usual class photos, individual photos and other types of photos of students taken at the beginning of each school year by the official photographer of the LFIP, ordered at our request and within a restricted scope, there is no commercial use of the image of our students or of our employees.

The collecting of images by surveillance systems is made in accordance with the current legislation; the images are destroyed 30 days after the registration.

For any information concerning the Data Protection Policy or the Image Use Policy, please contact:

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Address: Rua Gil Eanes, 21, 4150-348 Porto  
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