



DCSL

Protection of Personal Information Policy

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DEVELOPED BY/AUTHOR	DCSL/Yulchon



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Policy Objectives

Dulwich College Seoul (hereinafter 'School'), in accordance with Personal Information Protection Act Article 30, establishes and announces the following personal information policy in order to protect personal information of information subjects, and to quickly and smoothly handle related difficulties.

Article 1 (Purpose for Processing Personal Information)

The School processes personal information for the following purposes. Personal information being processed will not be used other than below stated purposes, when the purpose changes, we will perform necessary action such as obtaining additional consent, in accordance with Personal Information Protection Act Article 18:

School operation and activities consistent with the ethos and philosophy of the School, which form part of the learning and teaching, or which directly or indirectly advance the educational and developmental potential of the students including furthering academic studies, student's holistic learning development and enrichment, or which is required for school administration, verification of identity, request for services by students or parents, billing and payment of fees and charges, prevention of unlawful use, academic affairs, admissions related work, to check if there is consent on the personal information processing from the legal representative of a child under 14, send information and notifications, difficulties treatment, etc.

Sharing and management of personal information relating to students and parents with the other Dulwich Colleges and their affiliates in the jurisdictions in which they operate (collectively, the "DCI group"), and in addition with each of the providers listed in the table in Article 3 and Article 4 which also details the country to which the personal information will be transferred. The aforesaid management and transfer will continue whilst the student is enrolled at the School, and whilst the parent or student continue to use the services provided by these programmes or providers after the student has graduated or departed from the School. Parents also agree that the personal information disclosed and collected pursuant to this consent will be retained and used by the School, DCI group or any other party permitted hereunder for the period as detailed in the providers list.

Usage of personal information, including photographs or videos for the purposes of academic public communication through the College's communication channels and management to inform on the intended curriculum, academic testing results or the College's academic, co-curricular, cultural and sporting events as the opportunity to respond.

In addition, the School uses the "cookies," which store the information regarding the User and load such information from time to time in order to provide individually catered Services. The cookies consist of a small amount of information transmitted by the website



server to the User's browser and are saved in the hard disk drive of the User's computer. The School may provide certain catered Services only through the use of the cookies. The School may use the cookies in order to identify the Member and maintain the Member's log-in status.

The User has the right to choose whether to install the cookies. Accordingly, the User may allow or refuse all cookies or require a confirmation each time the cookies are saved by changing the options of the web browser. How to set the option whether to allow cookie installation (for Internet Explorer):

- Select [Internet Option] from the [Tool] menu.
- Click [Personal Information] tab.
- Select the level of cookies to be allowed on [Managing Internet Area].
- Refusal to save cookies may restrict certain Services offered by the Company, such as an individually catered Service.

Article 2 (Processing of Personal Information and Holding Period)

When personal information is collected from the information subject, the School will process and hold personal information collected only within the period of time and specified purpose the information subject has agreed for. Regarding the personal information collected from the child and parents during the enrolment/re-enrolment process, the school retains and uses the information until the purposes of collection and use completely cease to exist or until the student withdraws the consent to the Headmaster of the School.

Article 3 (Provision of Personal Information to a Third Party)

1. The School will only process the personal information from the information subject within the scope mentioned in Article 1 (Purpose for Processing Personal Information), and only with the consent of the information subject, provision of law, and other regulatory rules that are applicable to Personal Information Protection Act Article 17 can the personal information be provided to a third party.
2. [The School is providing personal information to third parties as attached here 'third party PIPA information'](#)
 - Attachment (System, Country, Purpose, Contents, Retained and used)



Article 4 (Consignment of Personal Information Processing)

1. The School is providing personal information to third parties as attached [here](#) 'third party PIPA information'
2. When signing the consignment contract, the School shall abide by personal Information Protection Act Article 25 and specify duties of the consignee, for example prohibit processing of personal information other than stated purposes, technical and managerial protection measure, restrict re-consign, and management, supervision, compensation for damage, and etc. on the document such as contract, and supervise if the consignee process personal information in a safe manner.
3. In the event of changes to job description of consignee, the School will announce the change through this Policy expeditiously.

Article 5 (Information Subject's Right, Duty, and Execution Method)

1. Information subject may exercise the following rights regarding personal information protection to the School at any time.
 - Review personal information
 - Request correction where there are errors
 - Request deletion
 - Request termination of processing
 - Request the source of collection
2. The exercise of rights in relation to Clause 1 can be carried out via document, telephone, email, FAX, etc. and the School will take action expeditiously.
3. When the information subject has requested correction or deletion of errors on the information, the School shall immediately cease utilization of the information and/or providing them to any person.
4. The exercise of rights in relation to Clause 1 can also be carried out via legal representative or a delegated person. In this case, a power of attorney in accordance with the form in Personal Information Protection Act Annex 11 must be submitted.
5. Information subject must not infringe one's own or another person's personal information or privacy that the School is processing, by violating related Acts such as Personal Information Protection Act.



Article 6 (Personal Information Items Processed)

The School should collect Personal Information within minimum range and only necessary purpose. The School is processing personal information including photographs **and videos** that are collected via the application form, personal particulars form, communication made with the School from time to time, or during or in connection with School activities and events.

Article 7 (Discard Personal Information)

1. The School will discard the personal information expeditiously once the information reaches its expiration of holding periods or intended purpose.
2. When keeping the personal information instead of discarding following a different legislation, even when the information reached its expiration of holding periods or intended purpose, the information must be transferred to a separate database(DB) of stored in a separate place.
3. Personal information discard process and method are as below.
 - Discard process:
The School shall select personal information that need to be discarded, and discard with the approval form the School's person in responsibility of personal information protection.
 - Discard method:
The School shall discard electronically recorded and stored personal information to Low Format so it cannot be restored, information recorded and stored in paper documents shall be shredded or incinerated.
 - Should discard within 5 days after useless day except valid reasons. And should record & manage the deletion and disuse.

Article 8 (Secure the Safety of Personal Information)

The School is taking the following measures to secure the safety of personal information.

- Management measure: establish and execute internal control plan, regular staff training.



- Technical measure: access control on personal information processing system, installing control system, encrypting identification numbers, install security programs.
- Physical measure: restrict access to data room, information storage.

Article 9 (Personal Information Protection Officer)

1. The School will be responsible for all the jobs related to personal information processing, and designate a person in responsibility of personal information protection to handle complaints and damage relief in relation to personal information processing.

Responsible officer: Director of Business Administration

Contact Information Tel: 82 2 3015 8500, Fax: 82 2 501 9748, pipa@dulwich-seoul.kr

Coordinator: Compliance manager

Contact Information Tel: 82 2 3015 8585, Fax: 82 2 501 9748, steve.kim@dulwich-seoul.kr

2. Information subject may contact the Personal Information Protecting Officer or the Personal Information Protection Department for any issues in relation to personal information protection, complaints, and damages occurred while in School. The School will respond and deal with information subject's inquired expeditiously.

Article 10 (Request to Review Personal Information)

Information subject may request to review personal information with the Person Responsible for Personal Information Protection. The School will cooperate for the personal information review request to be proceeded with expeditiously.

Article 11 (Installation and Operation of Image Information Processing Equipment)

Dulwich College Seoul has installed and is operating Image Information Processing Equipment as below.

1. Purpose of installing Image Information Processing Equipment: safeguarding, facility safety, fire prevention of Dulwich College Seoul



2. Number of equipment installed, location, recording range: 286 units installed in the main lobby, classrooms and elsewhere throughout the facility. The recording range includes the whole area of the main facility.
3. Personal in Charge, department and the person with access with authority to the recorded information: The Headmaster, members of the College Leadership Team and the Security team.
4. Recorded hour, holding period, holding location, and processing methods of recorded information
 - Recorded hour: All day camera 24hours, motion camera will monitor when the sensor is activated.
 - Holding period: All day camera holds 40days, motion camera holds 50~60days from the day recorded
 - Bus CCTV: Recording students during bus ride for securing children's safety, preventing accident, protecting children.
 - Holding location and processing method: stored and processed in the School Security Office.
5. How/Where to review image information: school staff must gain approval to view from the Headmaster or Director of Business Administration.
6. The College keeps a video record of all online learning lessons to accommodate students who may have missed the live discussion. Recordings may also be used for other purposes by the School or DCI Group including, but not limited to, marketing or quality control purposes. Videos are stored on college owned devices and shared to student Google accounts where appropriate. A Dulwich College username and password combination is always required to access and the video content will be stored by the college for 12 months after the end of the academic year.
7. Measures to the requests such as information subject's inquiry to review the image information: must request via personal image information review request form and the request is only approved when the information subject himself/herself is recorded or it is obvious the information is necessary for the benefit of the information subject's life, body, asset.
8. Technical, managerial, physical measures for the protection of image information: establish internal control plan. Apply safe transmission/storage technology for the image information, measures to store records and prevent forgery, arrange for storage facility and install locks, and etc.



Article 12 (Change in Personal Information Policy)

This Personal Information Policy is applicable from 1st August 2017.

Supplementary Provision

This revised Personal Information Policy is applicable from 12th April 2019.

Supplementary Provision

This revised Personal Information Policy is applicable from 24th February 2020.