

Aldar Education Privacy Policy

Aldar Education is a wholly owned division of Aldar Properties PJSC. It comprises an operated schools business and a managed schools business, each component of which is serviced by different legal entities, through partnerships and pursuant to incorporated and unincorporated joint ventures. This Privacy Policy is issued on behalf of all education establishments comprised in the Aldar Education Group from time to time. When we refer to “**Aldar Education**”, “**we**”, “**us**” or “**our**” in this Privacy Policy, we are referring to the relevant organisation in the Aldar Education group of companies which has ownership of the relevant educational asset and/or which is responsible for processing your data. We will let you know which entity will be the controller for your data when you interact with a specific entity within the Aldar Education Group.

Aldar Education LLC is the controller and responsible for this website.

This Privacy Policy describes how Aldar Education collects and uses the personal information you provide (directly or through third parties), or which is automatically generated, when you interact with our schools (for example, if your child is a current or prospective pupil), interactions with any websites or mobile applications for any of our schools, or any other services provided by Aldar Education (our “**Services**”).

Article I. PERSONAL INFORMATION

Aldar Education is committed to providing a high level of security and privacy regarding the collection and use of personal information.

Personal information includes any information by which you or your child may be personally identified, such as a) first name, last name, gender, nationality, date of birth, address, contact telephone number, e-mail address, passport and national ID number, visa details and residency status, marital status and information relating to spouses, other children and dependents, status as a person of determination, UAE family book information; b) identification information issued by Aldar Education, such as a student enrolment number and a student ID number, c) educational record information, d) information about your computing device used to access our Services; e) details collected in order to set up your online user account from time to time or to administer payments, including payment details (subject to PCI-DSS standards where payment is made online or in person using credit or debit card), or through your submission of data to our online forms, mobile applications and website contact us pages; f) tools on our Services such as analytics tools; and g) any other personal information you may choose to provide to us from time to time, such as is in response to surveys or guardian engagement events.

Article II. COLLECTION AND USE OF PERSONAL INFORMATION

Collection

The personal information we collect and process may include:

- Identity information of you (and if applicable, your child) such as name, passport number and issuance/expiry date, unified identification and Emirates ID details, visa status and information, family book information, birth certificates, contact details, date of birth, gender, religion, next of kin, family details and marital status, status of the relationship between the guardian and the child.
- educational record information and educational history relating to your child, such as information regarding previous schools, exam board results, grade history, teaching sets and school reports, attendance records, incident reports, disciplinary records (if applicable), academic and non-academic attainments, special educational needs), joining and leaving date, details of transfers to other schools.
- health information regarding your child, including any relevant health issues you notify us of, medical conditions, allergies, vaccination records, information on disabilities or learning needs and any information collected as a result of medical incidents or accidents at school or whilst under our care.
- Information that you provide by filling in forms for the Services, including any enrolment / admissions onboarding forms.

- Personal information provided during an event, any contest/promotion run by Aldar Education institution or email or SMS campaign, marketing preferences and your responses to surveys that we might ask you to complete for research purposes.
- Search queries on any Aldar Education websites or apps or when you report a problem with any of the Services.
- Records and copies of your communications and contact with Aldar Education. Please note we may record your telephone calls with us for training and quality purposes but will inform you at the start of the call.
- Details of searches, enquiries and session details relating to your use of our websites or apps.
- Financial and transaction data – including payment card details and information about payments you make to us (for example, tuition fees), invoice details, details of reward points account and redemptions, if applicable.
- CCTV footage, information collected by our security systems and any other information collected when you or your child access our sites.
- Data we collect from government authorities (for example, the Abu Dhabi Department of Education and Knowledge (ADEK)). Please see Article VII, Third Party Disclosures, for more information.
- If you are applying for a job with Aldar Education, data that you or third parties (such as recruitment agencies or government authorities) provide to us as part of the recruitment process.
- Any other data or information that you or your child provides to us during the course of us providing the Services.

Article III. BASIS FOR PROCESSING

We rely on the following legal basis for processing personal data in connection with the Services:

- Where we are performing our contractual obligations in providing the Services - for example, providing education to your child.
- Where you have consented to us doing so – for example, by providing information to us as part of the enrolment process, you consent to us processing such information for the purposes of considering your child for admission to the Aldar Education institution(s) you have applied to and other administrative tasks associated with the admissions and enrolment process.
- To fulfil any legal obligations that we may have – for example, any legal requirements connected to the operation of education facilities in the Emirate of Abu Dhabi and the safeguarding of children.
- Where the processing is necessary to protect the interests of you or your child (for example to prevent your child from being harmed) or for any public interest purposes.
- Where we need to defend or initiate any legal proceedings.

If you are a citizen in a jurisdiction outside of the UAE, then there may be other lawful basis that we rely on for processing personal data. For example, we may need to process personal data where it is in our legitimate interests to do so.

If you have questions regarding our use of your personal information, please contact us at [\[myexperience@aldareducation.com\]](mailto:myexperience@aldareducation.com).

Article IV. PURPOSE OF USE

All personal information collected and stored by Aldar Education is used for one of the following purposes:

- To consider an application for your child to study at one of the Aldar Education institutions, including to assess your child's suitability for admission and check for any wellbeing or safeguarding issues.
- To provide education services, including any extra-curricular activities and school trips that we may make available at any of the Aldar Education institutions and to administer your relationship and the student's relationship with us regarding such services.
- To comply with any obligations that we may have to governmental authorities (for example ADEK) as well as to enable any relevant authorities to monitor the performance of Aldar Education institutions.
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of Aldar Education institutions.
- To better understand yours and your child's needs and how our Services are used in order to design, improve and optimise our Services.
- To grant you and/or your child access to any of our Services and provide the Services to you including to allow us to process any Service requests and facilitate your use of our website and app (including to speed up your preferred searches on our websites).
- To respond to communications from you and to maintain relationships with alumni and the school community.
- To inform you about our own and third-parties' news, projects and services that may be of interest to you.
- To comply with laws and regulations including relating to the provision of education services and child protection.
- To generate or maintain records that Aldar Education is required to generate or maintain in accordance with any agreements it has with regulatory authorities in the United Arab Emirates from time to time.

Article V. COOKIES

When you browse any of our websites or apps, Aldar Education collects certain information about your computing device, browsing actions and patterns e.g. by use of cookies, device ids, etc.

Cookies - An HTTP cookie (also called web cookie, Internet cookie, browser cookie or simply cookie) is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. Cookies were designed to be a reliable mechanism for websites to remember stateful information (such as items added in the shopping cart in an online store) or to record the user's browsing activity (including clicking particular buttons, logging in, or recording which pages were visited in the past).

Aldar Education websites and mobile applications may collect following information using cookies:

- Information about your computer, IP address, operating system and browser type.
- Google Analytics to provide us with basic information relating to how our websites are being used. However, we do not track your activities across third party websites.

Aldar Education does not collect or store any sensitive information such as your financial information in our cookies.

You can configure your cookie settings in your web browser and mobile device and in some in-app settings. However, our Services may not function properly if cookies are disabled.

Article VI. PROTECTION OF INFORMATION

- By employing stringent security measures in the collection and processing of your personal information, all online forms on Aldar Education websites or mobile applications are submitted to backend systems through an encrypted and secured transmission channel (SSL), however please note we cannot guarantee security of your data outside of the control of Aldar Education. Communications over public telecommunications networks, including the internet, cannot be guaranteed to be secure.
- Aldar Education limits its employees' and contractors' access to your personal information to only those personnel who hold a business reason for having access to such information.
- We educate all of our employees about the importance of confidentiality and the privacy of your personal information and our legal responsibilities. In addition, our personnel must use individual user names and passwords to access your personal information and we monitor use and access of our systems. This maintains an audit-trail by identifying who accessed or in any way modified your personal information.
- We employ logical and physical security access controls and we deploy reasonable technical and organisational security measures intended to protect your personal information from unauthorised or accidental access, use and disclosure, and against loss, destruction and theft.
- Any payments that we process on our website or app which are made by payment card will be processed in compliance with PCI-DSS standards.
- It is your responsibility to keep your login ids and passwords to the Services secure. You should not disclose them to any other person and you should update your password without delay if you believe it has been disclosed.
- Aldar Education will never request you to disclose any personal information through e-mails.

Article VII. THIRD PARTY DISCLOSURE

You agree that any and all personal information Aldar Education holds in relation to your use of the Services or access to our website or app from time to time may be disclosed for such purposes and to such persons as required to enable Aldar Education to fulfil its obligations under all applicable UAE laws, orders, decrees, decisions, judicial requests and other binding instruments (including without limitation those related to providing educational facilities and child safeguarding).

When Aldar Education shares your information with private third parties we ensure that we impose obligations on such third parties to protect your personal information and that a written binding contract is in place accordingly.

Aldar Education does not provide your personal information to third parties for their own marketing purposes and does not sell any of your personal information.

Yours or your child's personal information may be shared:

- With a third party if you request it. For example, you may ask us to share education information with a university or other future education institution.
- If you have chosen to participate in loyalty or reward schemes administered by a third party with which Aldar Education has a relationship, such as the Darna digital loyalty program.
- With other businesses within the Aldar group which provide Aldar Education with services, such as the Aldar customer experience team, which provides support services. including complaints handling, addressing concerns or enquiries, and to support with quality assurance.
- With other businesses within the Aldar group for the purposes of conducting activities for the benefit of multiple Aldar Education, such as comparison of academic attainment, monitoring trends, quality

control and assessment, joint promotions or activities. To the extent possible, non-personally identifiable information will be used for such purposes.

- With other organisations that are required to have access to it in connection with your child's education (for example, exam boards).
- If the disclosure is required or allowed by law e.g., to police or other judicial or competent authority.
- With government agencies (such as ADEK) as required under our legal obligations or in response to official requests.
- With professional advisers including lawyers, bankers, financial service providers, auditors and insurers who provide banking, financial, legal, insurance, consultancy and accounting services to us.
- With IT and technical service providers that provide us with IT and technical services which allow our websites, apps and other software used by Aldar Education institutions to operate.
- With service providers such as payment service providers, insight and marketing service providers, transport service providers and caterers.
- With third parties, to whom we may choose to sell, transfer or merge parts of our business or our assets.
- With reputable reporting agencies, or during the investigation of a fraudulent or suspected fraudulent activity.
- In conjunction with joint marketing agreements we have entered.

By using the Services, you acknowledge and agree to the sharing of yours and your child's personal information as described above.

Article VIII.YOUR DATA PROTECTION CHOICES

You may request certain actions or preferences in relation to your personal data. These requests may include:

- **access:** to receive access and copies of your personal data.
- **rectification:** to amend any inaccurate personal data which we hold about you.
- **erasure:** to erase the personal data we hold about you (subject to our legal requirements).
- **restriction of processing:** to restrict our processing of your personal data in certain circumstances.
- **data portability:** to provide you with your personal data in a structured, commonly used, and machine-readable format and have your personal data transmitted to another data controller in certain circumstances and where it is technically feasible.
- **object:** to object where we process your personal data for direct marketing purposes. You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms we use to collect your data. We also include an opt-out link to "unsubscribe" or "opt-out" of receiving marketing communications on each marketing communication we send to you.

You can enquire about your data protection choices and options at any time by contacting us at myexperience@aldareducation.com. We will give due and proper consideration to all such enquiries and will comply with applicable law.

Our site may, from time to time, contain links to and from the websites of other Aldar Education platforms, our partners (which may include government partners), advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies that will apply and are not subject to this privacy policy. Aldar Education does not accept any responsibility or liability for how these third-parties use your personal information. Please check the relevant policies before you submit any personal data to these websites.

Article IX. RETENTION & ANOYMISATION OF YOUR PERSONAL INFORMATION

We will retain your personal data for the duration required to fulfil the purposes outlined in this Privacy Policy, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. and for so long as you maintain an account with Aldar Education plus a reasonable subsequent period (unless we are required by law to delete your data sooner).

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for analytics, market research and business development purposes, in which case we may use this anonymised information indefinitely without further notice to you.

Article X. PRIVACY POLICY UPDATES

Aldar Education reserves the right in its discretion to change its data processing activities and any change will be reflected in this Privacy Policy. You are responsible for periodically visiting this Privacy Policy to check for any policy changes. If you no longer accept the Privacy Policy and agree with our use of your personal data in accordance with it then you should cease using our Services.