

# Online Privacy Policy

## 1. About the Privacy Policy

Lusaka International Community School ("LICS" or "we" or "us" or "our") strives to ensure that our use of the Personal Information of data subjects is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving our offerings and your experience.

LICS respects privacy and is committed to protecting the privacy of visitors to this site. LICS seeks to employ best practice when it comes to the collection and processing of personal information in accordance with data protection or privacy legislation.

This policy applies to LICS, its subsidiaries and business units. Reference to LICS, we, us or our in this policy shall mean LICS and any of its subsidiaries.

Where we provide links to websites of other organisations, this Privacy Policy does not cover how that organisation processes personal information. If you follow a link to any website, please read the privacy policy of the website you visit before you submit any personal information to such website as LICS is **not responsible** for information captured and processed on any website linked to our website.

This LICS Privacy Policy sets out what we will do with any Personal Information we collect from or about data subjects, or that you provide to us, when you use our services, including our websites and student portals (which we also collectively refer to in this Privacy Policy as the "Website") or when you enrol at any of our institutions. Please read this Privacy Policy carefully to understand our views and practices regarding your Personal Information and how we will treat it.

It is important that you read this Privacy Policy together with our website terms and conditions and any other document or agreements which describes the manner in which we may provide in specific circumstances when we are collecting or processing personal information about you. This will enable you to properly understand the manner in which LICS will process your Personal Information. This Privacy Policy supplements our website terms and condition and any such other documents and agreements, and this Privacy Policy is not intended to override them.

If you are a data subject, as defined in the Data Protection Act, No.3 of 2021, we have a duty to point out certain important terms to you. It is therefore very important that you read and understand the information contained herein as it serves to enlighten you inter alia on:

- The nature of the personal information about you that we will collect and how we will process the same
- The different means and sources through which we will collect your personal information
- How we will use the information that we will collect and for what purpose
- Our obligations and limitations in respect of sharing your personal information
- Our Obligations and your rights in respect of transfer of your personal information to jurisdictions with different data protection laws
- Storage and retention of your personal information
- Our undertaking on the quality and the protection of your personal information
- Your right to access, correct, or withdraw your consent of the use of your personal information
- Your liability in respect of acknowledgement of facts by you.

## 2. Definitions

In this Policy, unless the context otherwise expressly requires, the following expressions shall have the following meanings:

Expression	Meaning
"Access Device"	means any card, plate, code, account number or other means of account access that can be used, alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds;
"Aggregated Data"	means data which may include historical or statistical data;
"child"	means a person who has attained, or is below, the age of eighteen years;
"data"	means numbers, letters, alphabetic or numeric strings, symbols or codes in any form;
"data subject"	means an individual from, or in respect of whom, personal information is processed;
"LICS"	means the Lusaka International Community School, and any of its subsidiaries;
"Personal data / personal information"	refers to private information about an identifiable person (which includes natural persons as well as juristic persons, such as companies or trusts). Personal information does not include information that does not identify a person (including in instances where that information has been de-identified). It will also mean data which relates to an individual who can be directly or indirectly identified from that data which includes a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
"processing"	of personal information in the context of this policy will mean an operation or a set of operations which is or are performed on personal data, whether or not by automatic means, including the collection, recording or holding of the data or the carrying out of any operation or set of operations on data, including organisation, adaptation or alteration of the data; retrieval, consultation or use of the data; alignment, combination, blocking, erasure or destruction of the data; or disclosure of the information or data by transmission, dissemination or otherwise making available;
"Third party"	means a person other than a data subject; a data controller, or a data processor or other person authorised to process data on behalf of data controller or data processor.
"Vulnerable person"	means a person aged 18 or above and whose ability to make informed decisions about their rights and well-being is temporally or permanently impaired through physical or medically certified hindrance or impairment;

## 3. Personal Information collected from Data Subjects

LICS may collect, get, receive, record, organize, collate, store, update, change, retrieve, read, process, analyse, use and share Personal Information of data subjects in a way set out in this Privacy Policy and in accordance with the provisions of the Data Protection Act 2021. When we do one or more of these actions with a data subject's Personal Information, we are "Processing" that data subject's personal information. The personal information that we collect about data subjects may differ on the basis of the services that they are receiving from LICS.

We may process different kinds of personal data about a data subject which we have grouped together as follows:

- Identity Data, which includes information concerning a data subject's name, username or similar identifier, marital status, title, date of birth, gender, race and legal status, as well as copies of a data subject's identity documents, photographs, identity number, registration number and qualifications.
- Contact Data, which includes billing addresses, delivery addresses, email addresses and telephone number.
- Financial Data, which includes bank account and payment card details, insurance information, and

financial statements.

- Transaction Data, which includes details about payments to and from a data subject.
- Service Data, which includes information concerning a data subject's interactions with LICS as well as their performance in LICS administered educational courses.
- Security Data, which may include records of a data subject's access to our facilities, as well as CCTV camera footage of the data subject on or nearby our premises.
- Technical Data, which includes a data subject's internet protocol (IP) address, their login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices a data subject uses to access the Website.
- Usage Data, which includes information about how a data subject uses our Website, products and services; and
- Marketing and Communications Data, which includes a data subject's preferences in receiving marketing from us and our third parties and your communication preferences.

If any of the information you provide us contains special personal information, such as health, religion, ethnic or race information, the lawful basis we rely on to process it is your consent unless any other lawful basis exist in data protection or privacy legislation for us to process such information.

- Children and vulnerable persons

If any information you provide us contains the processing of personal information of children or vulnerable persons, for instance information given to us about a child or vulnerable person during a complaint resolution process, this processing of personal information of the child/ren or vulnerable person/s may only be carried out with the prior consent of the competent person such as a parent, guardian or a person exercising parental responsibility unless lawful basis exist in applicable data protection or privacy legislation allowing us to process such information without consent from a competent person being obtained.

We do not provide services directly to children or vulnerable persons and our site is not available for use by any person under the age of 18 years or such persons requiring supervision without consent from a competent person such as parent, guardian or a person exercising parental responsibility. This Privacy Policy also applies in a case where a child or vulnerable person makes use of our website with the consent from a competent person. Use of our website by a child or vulnerable person without the relevant consent from a competent person is prohibited. LICS undertakes to that where the personal data of a child or a vulnerable person is involved, we shall make every reasonable effort to verify that consent has been given or authorised, taking into account available technology.

LICS may also process, collect, store and/or use aggregated data, which may include historical or statistical data ("Aggregated Data") for any purpose. Aggregated Data could be derived from your personal information but is not considered personal information as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we will treat the combined data as personal information which will be used in accordance with this Privacy Policy.

#### **4. How we collect data subject's Personal Information**

We collect personal information in three ways, namely:

- through direct or active interactions with the data subject
- through automated or passive interactions with the data subject; and
- from third parties.

### **Direct or active collection from data subject**

We may require you to submit certain information in order for you to access certain portions of the Website, to enable us to provide certain services to you (e.g. requesting further information, applying for a vacancy, enrolling in a school, prospectus ordering) or to conclude an agreement with us, or when we fulfil our statutory obligations. We also collect information directly from you when you communicate directly with us, for example via e-mail, telephone calls, feedback forms, site comments and forums. If you contact us, we may keep a record of that correspondence. The information we may actively collect from you may include any of the information listed in section 2 of this Privacy Policy.

### **Passive collection from your Access Device**

We passively collect some of your personal information from devices that you use to access and ~~negative~~ navigate through the Website or to access any network administered by LICS (each an "Access Device"), using various technological means. The information which we passively collect from your Access Device may include your Identity Data, your Contract Data, your Security Data, your Technical Data, your Usage Data and your Marketing and Communications Data, and any other information which you permit us, from time to time, to passively collect from your Access Device.

### **Information collected from third parties**

LICS may receive personal information about a data subject from various third parties and public sources and will treat that information with due care.

## **5. How the information collected is used**

Personal information provided to LICS by data subjects will only be used for the purposes stated when the personal information is requested.

We may use your personal information:

- to provide our services, as well as any goods that data subjects may purchase from us (including goods purchased from our website).
- to administer our various education programmes.
- to operate our facilities.
- to comply with our statutory obligations, including submissions to the Companies and Intellectual Property Commission, as well as interacting with regulatory authorities.
- to conduct business case analysis.
- to conduct LICS's recruitment exercises, including referrals, and hiring processes, including the capturing of a job applicant's details and the providing of status updates to such a job applicant. In this context LICS will conduct criminal record and credit checks.
- to retain and make information available to data subjects on the Website.
- to provide marketing that is relevant or to direct information concerning LICS to our customers or potential customers
- maintain and update our customer, or potential customer databases.
- to establish and verify your identity on the Website.

- diagnose and deal with technical issues and customer support queries and other user queries.
- operate, administer, maintain, secure and develop the Website and the performance and functionality of the Website.
- to protect our rights in any litigation that may involve the public.
- detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorized use of the Website and/or contravention of this Privacy Policy or any of the terms and conditions that apply to the public's use of the Website.
- communicate with the public and keep a record of our communications with the public
- To disseminate information about any changes to the Website, the Privacy Policy or other changes which are relevant to our customers or potential customers.
- to create user profiles and analyse and compare how users make use of the Website, including (without limitation) habits, click-patterns, preferences, frequency and times of use, trends and demographics.
- to analyse and compare the kinds of Access Devices that are used and to determine locations from where they are being used; and
- for other purposes relevant to our business activities, provided they are lawful.

Demographical and statistical information about user behaviour may be collected and used to analyse the popularity and effectiveness of LICS website. Any disclosure of this information will be in aggregated and anonymised form and will not identify individual users.

LICS will restrict its processing of Personal Information to the original purposes for which we collected it, unless LICS reasonably considers that it is required to be processed for another purpose and that purpose is compatible with the original purpose. If you would like us to explain how the further processing for the new purpose is compatible with the original purpose, please contact us.

## 6. Sharing of Personal Information

We will not intentionally disclose, for commercial gain or otherwise, Personal Information other than as set out in this Privacy Policy or with your permission or where or where we are obligated to do so by law.

LICS may share Personal Information under the following circumstances:

- to our agents, advisers, service providers and supplier which have agreed to be bound by this Privacy Policy or on terms which offer the same level of protection as this Privacy Policy.
- to our employees, suppliers, service providers and agents if and to the extent that they need to know that information in order to process it for us and/or to provide services for or to us, such as hosting, development and administration, technical support and other support services relating to the Website or the operation of the LICS business. We will authorise any information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions.
- in order to enforce or apply any other contract between you and us.
- in order to protect our rights, property or safety or that of our customers, employees, contractors, supplies, service providers, agents and any other third party.
- in order to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third party.

- to governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:
  - comply with the law or with any legal process.
  - protect and defend the rights, property or safety of LICS, or our customers, employees, contractors, suppliers, service providers, agents or any third party.
  - detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorized use of the Website and/or contravention of this Privacy Policy; and
  - protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

## 7. Cross Border Transfer

Information that we collect from data subjects may be collected in, or transferred to, a destination outside of Zambia. Such destination may not have comparable data protection legislation, and such collected information may also be processed by staff operating outside Zambia who work for us or for one of our contractors. By submitting personal information, as a data subject you agree to this transfer, storing and processing. We will take all steps reasonably necessary, including imposing certain contractual terms, to ensure that the data subjects' data is treated securely and in accordance with this Privacy Policy.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information outside of Zambia or the destination in which we collected the personal information.

## 8. How we store information collected

Personal information is held only as long as is necessary in terms of the data subject's authorisation or as may be legally required or permitted. Personal information provided to us will be stored electronically on our servers or those of our service providers, as well as in hard copy format (at times), with reasonable organisation and technical safeguards in place to protect this personal information. However, we do work with third party contractors, some of whom host and operate certain features of the website.

If you subscribe for data, news, announcements, alerts or any such information to be emailed to you from LICS, we will hold your details on our database until such time as you chose to unsubscribe from this service. You may do this at any stage by selecting the appropriate option in the alerts section of this site.

We may keep and process some or all of your personal information if and for as long as:

- we are required or permitted by law or a contract with you to keep it
- we reasonably need it for lawful purposes related to our functions and activities
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

To determine the appropriate retention period for personal information, LICS will consider, among other things, the quantity, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means. LICS will always comply with applicable legal, regulatory, tax, accounting or other requirements as they pertain to the retention of personal information.

## 9. Quality and Protection of Personal Information

We make every effort to keep the personal information we hold updated, complete and accurate. It is the duty of a data subject duty to provide LICS with their most up to date personal information and this can be done by way of email to [info@lics.co.zm](mailto:info@lics.co.zm).

LICS strives to ensure the security of personal information we hold by taking reasonable measures to prevent destruction, unlawful access and loss of personal information. Any compromise of data integrity or confidentiality will be reported to you by written notice.

The above notwithstanding, we cannot reasonably guarantee that personal information is 100% secure in consideration of the attendant challenges in fighting cyber-crime. We do however undertake to make every effort possible to us to ensure such security to the best of our capacity.

Please contact us by phone, or email if you:

- Require access to any of your personal information we have on our database; or
- Wish to notify us of any change, modification or correction; or
- Would like to have your personal information removed from our records.

We will require suitable proof of identity from you before we can action any of the above requests.

## 10. How we use “Cookies”

In so far as our web pages use ‘cookies’, a cookie is a small file of letters and numbers that we place on your computer or mobile device, if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For more detailed information on the cookies we use on LICS’s sites and the purposes for which we use them, please see our Cookie Statement. Please refer to individual subsidiaries’ sites for further information about the use of cookies on their specific sites.

## 11. Data Subject’s Rights

Please note that the rights of data subjects are protected under data protection laws in relation to their personal information. Data subjects have the right to:

- Request access to their personal information (commonly known as a "data subject' access request"). This enables them to receive a copy of the personal information that LICS has about them. It should be noted that we may refuse such a request for access or disclosure of personal information if any of the grounds permitted in law apply.
- Request correction of the personal information that we hold about them. This enables the data subject to ensure that any incomplete or inaccurate data that LICS holds about them is corrected. A data subject can exercise this right by contacting us using the prescribed channels and informing us that their data is incomplete or inaccurate and point out to what extent they believe that said information is inaccurate or incomplete. The data subject must then explain to us how we should correct or complete their information, having provided us with the evidence of inaccuracies if available. On receipt of such request we shall, as soon as reasonably practicable, correct or complete the personal information.
- Request erasure of personal data. This enables a data subject you to request that LICS delete or remove personal information where there is no lawful basis for us continuing to process it. Data subjects also have the right to ask us to delete or remove their personal information where they have successfully exercised their right to object to processing, where we may have processed their information unlawfully or where we are required to erase or de-identify their personal information to comply with applicable law.

- Where specific legal reasons subsist for not complying with a data subject's request of erasure of personal information, such reasons will be notified to the data subject at the time of their request.
- Withdraw consent at any time where we are relying on consent to process their personal information. However, this will not affect the lawfulness of any processing carried out before such withdrawal of consent by the data subject. If a data subject withdraws their consent, we may not be able to provide certain products or services to them. We will advise if this is the case at any time a data subject withdraws their consent.

Please note that we may continue to process your personal information in certain instances where we are not relying on your consent.

- Object in accordance with applicable data protection or privacy legislation, at any time, to us processing or using their personal information and we shall no longer process that personal information. Should a data subject require to exercise their right to object, they must inform us that they do not want us to process their personal information and state the reasons why we should stop using such personal information to which they specifically object.
- Should we have no lawful basis for processing the personal information which is the subject of the objection raised by the data subject, we shall stop using such personal information. If however, data protection or privacy legislation or other agreements with the data subject otherwise provide us with a lawful basis for or justifies our continuing to process such information, this will be accordingly communicated to the data subject in light of their objection.

## 12. Direct Marketing

When you register to use the Website, you agree to receive marketing communications from us. You may refuse, accept, require us to discontinue, or pre-emptively block any approach or communications from us if that approach or communication is primarily for the purpose of direct marketing ("direct marketing communications").

You may opt out of receiving direct marketing communications from us at any time by requesting us (in the manner set out in the communication or by contacting us at the contact details set out in clause 16) to desist from initiating any direct marketing to you. If you have opted out, we may send you written (which may include electronic writing) confirmation of receipt of your opt out request, and not send you any further direct marketing communications. Please note that you may continue to receive communications from us that are not marketing related.

## 13. Consumer Protection and Protection of Personal Information Legislation

If any party of this Privacy Policy is regulated by or is subject to the Competition and Consumer Protection Act, 2010, or the Data Protection Act 2021 it is not intended that any part of this Privacy Policy contravenes any provision of the aforementioned legislation. Therefore, all provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of the Competition and Consumer Protection Act, 2010 and the Data Protection Act 2021 are complied with.

No provisions of this Privacy Policy (or any contract governed by this Privacy Policy):

- does or purports to limit or exempt us or any person or entity from any liability (including, without limitation, for any loss directly or indirectly attributable to our gross negligence or wilful default or that of any other person acting for or controlled by us) to the extent that the law does not allow such a limitation or exemption
- requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability; or



- limits or excludes any warranties or obligations which are implied into this Privacy Policy (or any contract governed by this Privacy Policy) by the Competition and Consumer Protection Act, 2010 or the Data Protection Act 2021 (to the extent they are applicable) or which we give under the Competition and Consumer Protection Act, 2010 or the Data Protection Act 2021 (to the extent they are applicable), to the extent that the law does not allow them to be limited or excluded.

#### **14. Governing Law**

To the maximum extent possible, Zambian law applies to this Privacy Policy.

If any provision of this Privacy Policy is found to be illegal, void or unenforceable due to applicable law or by order of a court of a competent jurisdiction it shall be deemed deleted and the continuation in full force and effect of the remainder of the provisions will not be prejudiced.

#### **15. Changes to our Online Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on this page.

#### **16. Contact**

Any queries or concerns about privacy on this website should be sent by email to [info@lics.sch.zm](mailto:info@lics.sch.zm).

You have the right to make a complaint at any time to the office of the Head of School. You may also have recourse to relevant regulator, in your country if you are based outside of the Republic of Zambia. We would, however, appreciate the chance to deal with your concerns before you approach a regulator, so please contact us in the first instance.

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