

Online Privacy Policy

1. About the Privacy Policy

Lusaka International Community School (LICS) endeavours to ensure that all Personal Information of data subjects is utilised in a lawful, reasonable, and relevant manner to our business activities, to enhance our offerings and provide a better experience to our users.

LICS values privacy and is dedicated to safeguarding the privacy of visitors to our website. We strive to adhere to the best practices in the collection and processing of personal information following the relevant data protection or privacy legislation.

This policy applies to LICS, its subsidiaries, and business units. The terms LICS, “we”, “us”, or “our” in this policy refer to LICS and any of its subsidiaries.

In cases where we provide links to websites of other organisations, please note that this Privacy Policy does not cover how those organizations process personal information. If you decide to follow a link to any website, we advise that you review the privacy policy of the website you visit before submitting any personal information, as LICS is not accountable for information collected 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.

You must read this Privacy Policy together with our website terms and conditions and any other document or agreements which describe the way we may provide in specific circumstances when we are collecting or processing personal information about you. This will enable you to properly understand how 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 must point out certain important terms. It is therefore essential 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 will we 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 concerning the 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 to 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	This 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's Data	This means a person who has attained or is below, the age of eighteen years.
Data subject	Means numbers, letters, alphabetic or numeric strings, symbols or codes in any form.
LICS	This means an individual from, or in respect of whom, personal information is processed. Means the Lusaka International Community School, and any of its subsidiaries. Refers to private information about an identifiable person.
Personal data / personal information	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	This means a person other than a data subject; a data controller, or a data processor or another person authorised to process data on behalf of data controller or data processor.
Vulnerable person	This means a person aged 18 or above 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, organise, 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 following 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 based on the services that they are receiving from LICS.

We may process different kinds of personal data about a data subject which we have grouped 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 numbers.
- 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, 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, ethnicity or race information, the lawful basis we rely on to process it is your consent unless any other lawful basis exists 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 a 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 consent from a competent person. Use of our website by a child or vulnerable person without the relevant consent of a competent person is prohibited. LICS undertakes 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, considering 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 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 agree 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 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, 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 programs.
- 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, customer support queries and other user queries.
- Manages, maintains, secures, develops, and administers the website to optimise its performance and functionality.
- to protect our rights in any litigation that may involve the public.
- detect, prevent or deal with actual or alleged fraud, security or abuse, misuse or unauthorised 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 the 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 suppliers who 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 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.
- to enforce or apply any other contract between you and us.
- to protect our rights, property or safety or that of our customers, employees, contractors, suppliers, service providers, agents and any other third party.
- 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 unauthorised 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 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 following 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 you choose 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 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. A data subject duty must provide LICS with their most up-to-date personal information and this can be done by way of email to 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 cybercrime. We do, however, undertake to make every effort possible 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 on 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 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 concerning their personal information. Data subjects have the right to:

- Request access to their personal information (commonly known as a data subject's 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 pointing 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 evidence of inaccuracies if available. On receipt of such a request, we shall, as soon as reasonably practicable, correct or complete the personal information.
- Request erasure of personal data. This enables a data subject to request that LICS delete or remove personal information where there is no lawful basis for us to continue 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 for erasure of personal information, such reasons will be notified to the data subject at the time of their request.
- Withdraw consent at any time when we are relying on consent to process 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.

- Subject to following applicable data protection or privacy legislation, at any time, to our processing or using their personal information and we shall no longer process that personal information. Should a data subject be required 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 justify 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 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 part 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 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.

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 the 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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