

School of the Nations Privacy Policy

School of the Nations, registered under CNPJ 00.580.852/0001-03, with headquarters located at SHIS QI 21, Lot C1, Lago Sul, Brasília-DF, ZIP Code 71.655-600, is an educational institution offering early childhood, elementary, and high school education and respects privacy and confidentiality and promotes the protection and security of personal data.

This Privacy Policy ("Policy") is intended to inform you, the person who provides their personal data to School of the Nations ("Data Subject"), about how School of the Nations processes your personal data within the context of educational services, employment relationships, candidate recruitment processes, service provisions, and visits to the premises and/or website of the School.

School of the Nations may amend, revise, or update this Privacy Policy at any time. We recommend that you review it periodically to remain informed about how your personal data is processed and protected. This Policy was last updated on May 10, 2023.

1. WHAT CONSTITUTES PERSONAL DATA

1.1. Personal data refers to any information that, directly or indirectly, can identify a person, in accordance with Article 5, Section I, of the Brazilian General Data Protection Law (LGPD) – Law nº 13.709/2018.

2. WHAT PERSONAL DATA DOES SCHOOL OF THE NATIONS PROCESS AND FOR WHAT PURPOSES

2.1. School of the Nations collects and processes the personal data of data subjects as described in the table below, in accordance with the specified purpose and legal basis indicated.

DATA SUBJECT	PERSONAL DATA	PURPOSE	LEGAL BASIS
Students	Photos	Registration; Personal/student identification; Issuance of invoices and payment slips; Issuance of school documents, academic statements, certificates, and transcripts.	Contractual obligation (Educational Services Agreement) Legal Obligation (Law nº 9.394/1996 - LDB, Law nº 5.172/1966 - CTN)
	Full name		
	Social Name (if applicable)		
	ID number (a copy of the document)		
	Individual Taxpayer Identification Number (CPF) (a copy of the document)		
	Gender	Registration; Age identification	
	Date of Birth		
	Birth Certificate (a copy of the document)	Registration; Contact information (sending communications/notifications); Issuance of invoices and payment slips	
	Address (copy of supporting document)		



	Telephone number	Registration; Contact information (sending communications/notifications)	
	School transcripts	Proof of completion of previous school years	
	Transfer declaration from the previous school		
	Medical certificates	Justify absence or leave	
	Medical reports	Provide specialized services	
	Records of inadequate behavior	Apply disciplinary actions (warnings/suspensions)	
	Race	Comply with the legal obligation of the National Council of Education (School Census)	Legal Obligation
	Ethnicity		
	Disability status		
	Nationality		
	Vaccination cards	Comply with Article 93 of Law No. 5.321/2014	
	Blood type and RH factor	Comply with District Law No. 4.379/2009	
	Allergy tests and glucose tests		
	Religion	Provide alternative arrangements for tests and class attendance on religious observance days (Law No. 13.796/2019)	Legal Obligation Consent
Images (photos/videos)	Conducting online classes and school activities through digital platforms, either proprietary or third-party Publication on School of the Nations’ website, social media platforms (Facebook, Instagram, TikTok), YouTube, and the SeeSaw app; Printed distribution on posters, banners, etc., within and/or outside School of the Nations' premises Production of school keepsakes and commemorative materials related to the student’s academic life	Contractual Obligation Consent Legitimate Interest	
Voice (videos)			

Student’s Father, Student’s Mother, Student’s Legal Guardian, Adult responsible for the student	Full name	Registration, personal identification, issuance of invoices and payment slips, issuance of school documents, collection procedures	Contractual Obligation Legal Obligation (Law No. 9.394/1996 – LDB, Law No. 5.172/1966 – CTN)
	ID or Driver’s License (copy of the document)		
	CPF (copy of the document)		
	Address (copy of document)	Registration; Contact information (sending communications/notifications, informing about institutional events)	Regular Exercise of Rights (Art. 319, Brazilian Code of Civil Procedure – CPC/15)
	Telephone number		
	E-mail		
	Marital status	Registration; indication in legal action for breach of contract	
	Profession		
	Image (photos videos) – in events promoted by School of the Nations	Publication on School of the Nations’ website, social media platforms (Facebook, Instagram, TikTok), YouTube, and the SeeSaw app; Printed display on posters, banners, etc., within and/or outside School of the Nations’ premises;	Legal Obligation Consent
	Voice (videos) – in events promoted by School of the Nations		



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		Production of school keepsakes and commemorative materials related to the student's academic life.	
Authorized Third Parties	Name	Registration and identification of the third party authorized to pick up the student from school	Legal Obligation (District Law No. 5.821/2017)
	Degree of kinship		
Authorized Third Parties (emergency)	Name	Registration: contact for reporting a health-related matter concerning the student	Legitimate Interest
	Telephone		
	Degree of kinship		
Visitors (Prospective Families)	Name	Registration; Contact information	Legitimate Interest
	Telephone		
	E-mail		
Visitors Family Members	Image (photos and videos) – in school events promoted by School of the Nations	Publication on School of the Nations' website, social media platforms (Facebook, Instagram, TikTok), YouTube, and the SeeSaw app; Printed display on posters, banners, etc., within and/or outside the premises of School of the Nations; Production of school keepsakes and commemorative materials related to the student's academic life.	Legitimate Interest
	Voice (videos) – in school events promoted by School of the Nations		
Employees	Photo ID	Registration, personal identification, execution of the employment contract, and compliance with legal obligations	Execution of Employment Contract Legal Obligation (Labor Code – CLT, Union Agreements, National Tax Code – CTN, Social Security – FGTS)
	Full name		
	Date of birth		
	ID or Driver's License (a copy of the document)		
	CPF (a copy of the document)		
	Mother's and Father's names		
	Gender		
	Education Level		
	Place of birth		
	Nationality		
	Address		
	Telephone		
	E-mail (personal and institutional)		
	Position / Title / Role		
	Brazilian Work and Social Security Card 'Carteira de Trabalho e Previdência Social' (CTPS) (a copy of the document)		
	Social Security Program (Programa de Integração Social (PIS)) number		
	Voter Registration Card (copy of the document)		
	Military Service Number		
	Marital Status		
	Marriage Certificate (copy of the document)		
	Academic History		
	Medical Report (Person with Disability - PWD)		
	Records of Vacation, Leave (temporary, due to work-related accident or illness)		
	Remuneration / Salary		



	Bank Information	Process salary and benefits payments	
	Record of sanctions	Record inappropriate behavior and apply corresponding sanctions	
	Union membership	Deduct union contributions	Legal Obligation (Collective Bargaining Agreement)
	Occupational Health Certificate (pre-employment, termination, periodic, return-to-work, and change of function)	Assess employee health during hiring, termination, or leave processes	Execution of Employment Contract Legal Obligation (Regulatory Standard No. 07 – NR 07)
	Medical certificates	Justify absences	Execution of Employment Contract Legal Obligation (CLT, Union Agreements)
	Biometrics	Record and monitor working hours	
	Security footage (security cameras)	Workplace monitoring and supervision, logging access by unauthorized third parties	Legitimate Interest
	Image (photos)	Publication through apps with exclusive access for the school community (parents/guardians, teachers, and principals) – Nations App, PowerSchool, SeeSaw, etc.	Contract Execution Consent
	Voice (videos)	Production of school keepsakes and commemorative materials related to the student's academic life Publication on the school's website, social media platforms (Facebook, Instagram, TikTok), YouTube, and the school's app in printed form on posters, banners, etc., within and/or outside the premises of School of the Nations.	
Dependents	Birth certificate (minors)	Registration of employees' dependents for benefit eligibility	Legal Obligation (Collective Bargaining Agreement, INSS)
	National ID (copy of the document)		
	CPF number (copy of the document)		
Job Candidates	Full name	Pre-contractual procedures (the candidate expressed interest in the job opening), participation in a selection and interview process, and professional profile evaluation for hiring purposes	Pre-contractual Procedures for Employment
	Birth Date Age		
	marital status		
	Education level		
	Nationality		
	Address		
	Telephone		
	E-mail		
	Employment history		
	Professional experience		
	Criminal Record Certificate	Verify whether the candidate has a criminal record relevant to the position to be filled	
Independent Contractors	Full name	Registration, personal identification, contract execution, issuance of tax documents	Contract Execution (service agreement)
	ID or Driver's License number		
	CPF number		
	Address		
	Telephone		
	E-mail		

	Bank information	Make payment	Legal Obligation (Law No. 5.172/1966 – National Tax Code – CTN)
	Marital status	Registration and inclusion in legal proceedings for breach of contract	Regular Exercise of Rights (Art. 319, Brazilian Code of Civil Procedure – CPC/15)
	Profession		
Students / Students' Parents / Guardians / Employees / Contractors / Visitors	Security camera footage	Monitoring of the school environment; logging access by unauthorized third parties	Legitimate Interest
User (Website/App)	IP address	Identify and authenticate the user when accessing our website, app, and/or educational platforms.	Contract Execution Legitimate Interest
	Access logs		
	Access account		
	Cookies	Enhance the use and user experience of the website/platform.	Legitimate Interest

3. HOW AND FOR HOW LONG IS PERSONAL DATA STORED

- 3.1. Personal data is stored in secure areas with physical access barriers, within internal, access-restricted systems through logins and passwords, and in international cloud environments with appropriate security standards.
- 3.2. The personal data of the data subjects 'candidates' is stored by School of Nations for a period of 6 (six) months to 1 (one) year, unless the data subject explicitly notifies the data protection officer of their objection.
- 3.3. The personal data of data subjects identified as “students,” “parent(s) or guardian(s) of the student,” “authorized third parties,” “external third parties,” “employees,” “dependents,” and “independent service providers” are stored by the School of the Nations:
- 3.3.1. For as long as necessary to fulfill the specific purposes for which the data was collected;
 - 3.3.2. To meet legal or regulatory obligations requiring data retention;
 - 3.3.3. For a minimum of five (5) to ten (10) years to ensure the regular exercise of rights in legal and/or administrative proceedings;
 - 3.3.4. For an indefinite period, when justified by applicable legal or regulatory grounds.
- 3.4. If any of the circumstances mentioned above no longer justify the continued processing of personal data, said data will be completely deleted or altered/anonymized in such a way that it becomes impossible to identify the data subject from each piece of data.
- 3.5. The Data Subject may request the deletion of their personal data. This request will be fulfilled unless retention is required for legal compliance or the regular exercise of rights.

4. HOW AND WITH WHOM PERSONAL DATA IS SHARED

- 4.1. School of the Nations partners with third-party companies to deliver its services. Accordingly, personal data may be shared with these partners, all of whom are aligned with this Privacy Policy.
- 4.2. Data is shared solely to fulfill service-related purposes. We assess all partners and require them to commit contractually to data protection obligations to mitigate risks to Data Subjects.
- 4.3. Data may also be shared with third parties, including public or private entities or individuals such as service providers and system administrators, for contractual compliance, legal or regulatory obligations, or legitimate interest, always under appropriate information security practices to safeguard confidentiality.
- 4.4. School of the Nations implements robust security measures to prevent unauthorized access, alteration, disclosure, or destruction of personal data. These include internal reviews of our data processing procedures and physical safeguards to protect systems where personal data is stored.
- 4.5. Access to personal data is restricted to staff members whose roles require it. All employees are bound by confidentiality agreements and may face disciplinary actions, including dismissal or legal proceedings, in case of non-compliance.
- 4.6. **Public Authorities:** Personal data may be disclosed to public authorities to fulfill legal obligations. If mandated by a court or a legally competent authority, School of the Nations is obligated to comply.
- 4.7. **Protection of Rights:** School of the Nations reserves the right to share personal data when necessary to comply with legal obligations or to protect the rights of the institution, its employees, or third parties.

5. RIGHTS OF DATA SUBJECTS

- 5.1. Data Subjects are entitled to the following rights:
 - a) **Confirmation and Existence of Processing:** Every data subject has the right to confirm whether School of the Nations processes their data.
 - b) **Access:** Upon the existence and confirmation of the processing of their data, every data subject has the right to request access to understand which personal data is being processed and how it is being handled by School of the Nations.
 - c) **Portability:** Every data subject has the right to request the transfer of their data to another provider of products or services, while safeguarding the rights of School of Nations regarding the maintenance of trade and industrial secrets.
 - d) **Deletion:** Every data subject has the right to request the deletion of their data, except when the processing occurs in compliance with legal and regulatory obligations.

- e) **Anonymization, Blocking, or Deletion:** Every data subject who identifies the existence of any excessive or unnecessary data, or data processed in violation of the law or the purpose School of the Nations indicated for the processing, may request anonymization, blocking, or deletion.
- f) **Information on Consent:** Every data subject has the right to obtain information about the possibility of not providing consent and about the consequences of their refusal.
- g) **Revocation:** Every data subject who gives School of the Nations their consent for the processing of personal data will have the right to revoke it by means of a formal written request.

5.2. To exercise your rights as a data subject, you can contact School of the Nations at the email address: dpo@edn.org.br: dpo@edn.org.br

5.3. Upon receiving a request, School of the Nations may require identity verification to proceed. This may involve requesting additional information to ensure proper identification.

5.4. For a request made on behalf of a third-party data subject, it will be essential to provide a power of attorney signed by the data subject and/or their representative.

6. DATA PROTECTION OFFICER (DPO)

DPO: Tamara Luiza Marques de Souza

E-mail: dpo@edn.org.br