

Aldar Education Privacy Policy



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PURPOSE

The purpose of this Privacy Policy is to describe how Aldar Education (AE) collects and uses the personal information provided by the visitors / customers (directly or through third parties), or which is automatically generated, when they interact with AE schools, AE school websites or mobile applications or any other services provided by Aldar Education ("Services").

This Privacy Policy applies to www.aldaeducation.com and other associated school websites ("Websites") and mobile applications ("Mobile Apps"), which are owned and operated by Aldar Education and the associated schools (collectively, "AE," "Us," or "We") following Aldar Education Information Security policies and processes.

OVERVIEW

Aldar Education is a wholly owned division of Aldar Properties PJSC, comprising of operated schools and managed school's businesses. Each school business is serviced by different legal entities, through partnerships and pursuant to incorporated and unincorporated joint ventures.

Aldar Education LLC is the controller and responsible for Aldar Education Website and the Websites of Aldar Education Schools.

- By accessing or using Aldar Education Websites and Mobile Apps, visitors acknowledge that they read and understood this privacy policy which sets out how their information is collected and used by Aldar Education.
- If the visitor has additional questions regarding the privacy and security of their personal information, they can contact sd@aldaeducation.com.

PERSONAL INFORMATION

- Aldar Education is committed to providing a high level of security and privacy regarding the collection and use of personal information.
- This Privacy Policy informs the customer of how Aldar Education looks after their personal information when they visit Aldar Education's Website or use Aldar Education's Mobile Applications (regardless of where they do so from) and informs them about their privacy rights and how the law protects them.
- Personal information includes, but not limited to, any of the following information by which an individual or their child may be personally identified:
 - First name, last name, gender, nationality, date of birth, address, contact telephone number, e-mail address, passport, national ID number, visa details, residency status, marital status, information relating to spouses, other children and dependents, status as a person of determination, UAE family book information,
 - Identification information issued by Aldar Education, such as a student enrolment number and a student ID number,
 - Educational record information,
 - Information about the computing device used to access our Services,

- Details collected in order to set up the online user account from time to time or to administer payments, including payment details (subject to Payment Card Industry Data Security Standard (PCI DSS) where payment is made online or in person using credit or debit card), or through submission of data to our online forms, Mobile Applications and 'contact us' pages of our Website,
- Tools on our Services such as analytics tools, and
- Any other personal information provided to us from time to time, such as responses to surveys or guardian engagement events.

COLLECTION OF PERSONAL INFORMATION

- The information we collect, and process includes:
 - Identity information of an individual (and if applicable, their 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, marital status and status of the relationship between the guardian and the child.
 - Educational record information and educational history relating to a 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 and details of transfers to other schools.
 - Health information regarding a child, including any relevant health issues notified to Us, 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 provided to Us 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 through email or SMS campaign, including marketing preferences and responses to surveys conducted by Us for research purposes.
 - Search queries on any Aldar Education Websites or Mobile Apps or when a problem with any of the Services is reported to Us.
 - Records and copies of communications and contact with Aldar Education. Please note that telephone calls with Us may be recorded for training and quality purposes, with prior intimation at the start of the call.
 - Details of searches, enquiries and session details relating to the use of our websites or Mobile Apps.
 - Financial and transaction data, including payment card details and information about payments made 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 the individual or their child accesses our sites.
 - Data collected from government authorities (for example, the Abu Dhabi Department of Education and Knowledge (ADEK)) (refer to section of Third-Party Disclosures for details).

- Information collected through cookies and similar technologies (refer to section: Cookies).
- Data provided to Us as part of the recruitment process with Aldar Education, either by an individual or through third parties (such as recruitment agencies or government authorities).
- Any other data or information provided by an individual or their child to Us during the course of providing the Services.
- If the customer makes any purchase through Aldar Education's Website, Aldar Education will use a third-party payment gateway and will not store customer's credit card or other payment details. The third party that processes the payment will handle the customer's payment data in line with their regulatory requirements.
- Unless restricted by applicable law, a visitor or customer agrees that all personal information relating to you, collected by Aldar Education from our Websites & Mobile Apps from time to time may be used and disclosed for such purposes and to such persons as may be required in accordance with federal laws and regulations and as per Aldar Education's current Information Security Policy.

BASIS FOR PROCESSING

- Aldar Education relies on the following legal basis for processing personal information in connection with the Websites and Mobile Applications:
 - To perform our contractual obligations in providing the Services, for example, providing education to your child.
 - Where the individual has consented to Us doing so, for example, by providing information to us as part of the enrolment process, an individual provides Us consent to processing such information for the purposes of considering your child for admission to the Aldar Education institution(s) 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 an individual or their child (for example, to prevent the child from being harmed) or for any public interest purposes.
 - To defend or initiate any legal proceedings.
- If the individual is a citizen in a jurisdiction outside of the United Arab Emirates (UAE), then there may be other lawful basis that we rely on for processing personal information. For example, we may need to process personal information where it is in our legitimate interests to do so.
- If you have any questions regarding our use of your personal information, please contact Us at sd@aldareducation.com.

PURPOSE OF USE

- Aldar Education uses personal information collected and stored by Us for the following purposes:
 - To consider an application for the child to study at one of the Aldar Education institutions, including to assess the 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 the use of our Website and Mobile 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-party's 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 perform in accordance with any agreements it has with regulatory authorities in the UAE from time to time.
- Aldar Education will only use customer's personal information for the purposes for which Aldar Education collected it, unless Aldar Education reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
 - If Aldar Education needs to use your personal information for an unrelated purpose, you will be notified. Aldar Education will explain the legal basis which allows such usage.

COOKIES

- When you browse any of our websites or Mobile Apps, Aldar Education collects certain information about your computing device, browsing actions and patterns through the use of cookies and similar technologies.
- Cookies - A cookie is an element of data or a small text file that a website can send to your browser, which may then store it on your system. Aldar Education uses cookies to coordinate the information on its website as closely as possible to the preferences of you as a visitor (such as country and language choices). Further, cookies are used to personalize content and advertisements, to provide social media features and to analyse website traffic. Aldar Education also shares information about your use of the website with Aldar Education's social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

- Below you can find out more about the purpose of each type of cookie that we use:
 - Strictly Necessary cookies: Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
 - Performance cookies: Performance cookies play a crucial role in comprehending user interactions with our website. By anonymously collecting and reporting data, they offer valuable insights into vital areas such as page load times, user visits, navigation patterns, and error messages. This tracking of user page visits is instrumental in generating comprehensive reports that enable us to optimize the website for enhanced performance.
 - Functional cookies: Functional cookies are essential for the basic functioning of a website. They enable features like page navigation, access to secure areas, and remembering user preferences. Without these cookies, the website may not function properly.
 - Marketing cookies: Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers. They assist Aldar Education in converting leads by tracking cookies through third-party platforms.
- Aldar Education Websites and Mobile Apps may collect following information using cookies:
 - Geo location data, site & pages visited, traffic data, logs and other communication data while using Aldar Education Websites and Mobile Apps.
 - 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.
 - Web beacons may be used to count users visiting a web page or when an e-mail is opened etc.
 - Flash cookies may collect and store information about user likings and navigation.
 - Store information about your preferences, allowing us to customize our website according to your individual interests.
- Aldar Education does not collect or store any sensitive information such as your financial information in our cookies.
- The maximum retention period for tracked cookies is one year, meaning that Aldar Education do not retain cookies for longer than this duration. These cookies are used for the following purposes:
 - To identify customer's when they visit Aldar Education's platforms and to help them navigate through the platforms.
 - To help determine if they are logged into Aldar Education's platforms.
 - To store information about their preferences and to personalize Aldar Education's platforms for them.
 - To secure and protect their user account and Aldar Education's platforms.
 - Aldar Education's third-party partners may use cookies and non-cookie-based technologies to help Aldar Education show customers advertising based upon their browsing activities and interests. Aldar Education will not share their personal information with any third party for marketing purposes unless they have consented to Aldar Education doing so.

- If you don't wish to accept cookies from the Aldar Education Website, you can: leave this Website or configure preference by visiting the link given on our website to manage cookie settings (giving you the chance to decide whether to accept it) or to block all or certain categories of cookies. The browser can also delete previously stored cookies. Please see your browser's help facility for information on setting how cookies are handled. Even if you have turned off the setting in your browser that allows the use of cookies, you can still visit most of the sections available at Aldar Education Website. Our Services may not function properly if cookies are disabled.
- You can at any time change or withdraw your consent by visiting the link given on our website to manage cookie settings.

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 Apps are submitted to backend systems through an encrypted and secured transmission channel (SSL), however 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 usernames and passwords to access your personal information, and we monitor the 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 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.
- Aldar Education has put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where Aldar Education is legally required to do so.
- In alignment with the Federal Decree Law No. (45) of 2021 on the Protection of Personal Data and the ADEK Records Policy, Aldar Education has defined data protection controls within its Information Security Policy that outlines the measures implemented to safeguard organizational data, including data classification methodologies, access and authorization protocols, protection mechanisms against cybersecurity and other threats, as well as data recovery procedures.
- Aldar Education do not provide customer's personal information to other companies for the purpose of independent telemarketing or direct e-mail marketing of any non-financial products or services of those companies. Aldar Education upholds the utmost commitment to safeguarding customer data with the highest degree of confidentiality and security. Aldar Education's stringent measures include robust encryption protocols that are intended to ensure the protection of personal information.
- Any payments made by payment card on our website or Mobile App 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 must not disclose them to any other person, and you must 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.
- Your personal information may be shared with third Parties, which may include service providers, business partners or other entities that Aldar Education have a contractual relationship with, for the following purposes:
 - Processing transactions: To facilitate payment processing and other transaction-related services.
 - Service provision: To provide specific services or products to you, such as shipping companies for product delivery.
 - Analytics and insights: To gain valuable insights and improve Aldar Education's services through data analysis provided by trusted analytics partners.
 - Marketing and promotions: To deliver relevant marketing communications or promotional offers from carefully selected partners.
 - Legal obligations: for such purposes and to such persons as required to enable Aldar Education to fulfil its obligations under all applicable laws, orders, decrees, decisions, judicial requests and other binding instruments, such as reporting obligations and cooperation with law enforcement.
 - If you have chosen to participate in our products administered and developed by a third party with which Aldar Education has a relationship.
 - With other businesses within Aldar Education, such as the customer experience team, which provides support services. including complaints handling, addressing concerns or enquiries, and to support with quality assurance.
 - Aldar Education may use carefully selected third parties to perform services on Aldar Education's behalf or to assist Aldar Education with the provision of services to you. For example, Aldar Education may engage third party agents, distribution partners cloud service providers, IT service providers and other third parties to support and facilitate property sales and bookings, property handover, security services, brand promotions, marketing, advertising, communications, to personalize and optimize the service, to analyse and enhance data (including data about users' interactions with Aldar Education's services), and to provide legal, accounting, insurance, audit and other professional services. While providing such services, these third parties may have access to your personal information.
 - Aldar Education may collect and utilize your personal information for analytics, relevant messaging, improving your customer journey and experience. All information is secured and handled responsibly and protected in accordance with applicable laws and regulations.
- Subject to overriding legal obligations Aldar Education may be required to comply with (such as disclosing information to law enforcement authorities), Aldar Education enters into data protection agreements (non-disclosure agreements) with these third parties to maintain the confidentiality and security of your personal information. Aldar Education requires all third parties to respect the security of your personal information and to treat it in accordance with the law. Aldar Education do not allow the third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with Aldar Education's instructions.

UAE DATA PROTECTION LAW

- The UAE Federal Government approved decree law no. 45 of 2021 on 27th November 2021, and it was published in the UAE Gazette to come into effect on 2nd January 2022. UAE Data protection law is applicable to Aldar Education and its schools.

THIRD PARTY DISCLOSURE

- You agree that any and all personal information held by Aldar Education in relation to your use of the Services or access to our Website or Mobile 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. Aldar Education upholds the utmost commitment to safeguarding customer data with the highest degree of confidentiality and security. Aldar Education's stringent measures include robust encryption protocols that are intended to ensure the protection of 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 (Aldar Properties PJSC), 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 (Aldar Properties PJSC) for the purposes of conducting activities for the benefit of 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.
 - For analytics and insights: To gain valuable insights and improve Aldar Education's services through data analysis provided by trusted analytics partners.
 - For marketing and promotions: To deliver relevant marketing communications or promotional offers from carefully selected partners.
 - 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, Mobile 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.
- If you have chosen to participate in our products administered and developed by a third party with which Aldar Education has a relationship.
- Aldar Education may use carefully selected third parties to perform services on our behalf or to assist Aldar Education with the provision of services to you. For example, Aldar may engage third party agents, distribution partners cloud service providers, IT service providers and other third parties to support and facilitate brand promotions, marketing, advertising, communications, to personalize and optimize the service, to analyse and enhance data (including data about users' interactions with Aldar Education's services), and to provide legal, accounting, insurance, audit and other professional services. While providing such services, these third parties may have access to your personal information.
- 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.
- Aldar Education do not allow the third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with Aldar Education's instructions.
- By using our Services, you acknowledge and agree to sharing of yours and your child's personal information as described above.

YOUR DATA PROTECTION CHOICES

- You may request certain actions or preferences in relation to your personal information. These requests may include:
 - Access: to receive access and copies of your personal information.
 - Rectification: to amend any inaccurate personal information which we hold about you.
 - Erasure: to erase the personal information we hold about you (subject to our legal requirements).
 - Restriction of processing: to restrict our processing of your personal information in certain circumstances.
 - Data portability: to provide you with your personal information in a structured, commonly used, and machine-readable format and have your personal information transmitted to another data controller in certain circumstances and where it is technically feasible.

- Object: to object where we process your personal information for direct marketing purposes. You have the right to ask us not to process your personal information for marketing purposes. We will inform you (before collecting your data) if we intend to use your information 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 raise an enquiry about your data protection choices and options at any time by contacting us at sd@aldareducation.com. We will give due and proper consideration to all such enquiries and will comply with applicable laws.
- 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 information to these websites.
- Aldar Education may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. Aldar Education may also contact you to ask you for further information in relation to your request to speed up our response.

RETENTION AND ANONIMISATION OF YOUR PERSONAL INFORMATION

- We will retain your personal information 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 information (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.

PRIVACY POLICY UPDATES

- Aldar Education reserves the right in its discretion to change without warning or notice any information or material contained on the Aldar Education Websites and Mobile Apps, related policies and its terms and conditions, under which the Aldar Education services are used & offered. You are responsible for periodically visiting Aldar Education Websites and this Privacy Policy to check for any policy changes.
- Aldar Education may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirement, or other factors. Where necessary, we will make appropriate steps to inform you in advance of such changes.
- We encourage to you to review the Privacy Policy periodically to stay informed about how we protect your personal information. This version was last updated as the per the version history shown at the beginning of this document.