



# DATA PRIVACY POLICY

## Mission:

*Our mission is to provide students with a high-quality education while developing the attributes of **kindness, respect, and responsibility** towards others and the environment.*

## Philosophy:

*Saint-Charles International School follows the humanist and Christian values of caring for others and the environment, respecting cultures and individuals, and approaching the world with openness and positivity. Thus, the school aims to develop the same values in students and to support students in becoming responsible, global citizens who work to make the world a better place.*

Positions responsible for Policy: *Executive Director*  
Written / Updated: *03.03.2026*  
Next review: *03.03.2028*

Links to other school policies: [Safeguarding Policy](#)

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## 1. Introduction

Saint-Charles International School (“Saint-Charles”, “we”, “our”, “us”) takes the protection of personal data seriously.

This Privacy Notice explains how we collect, use, store and protect personal data in accordance with:

- The Swiss Federal Act on Data Protection (FADP)
- The EU General Data Protection Regulation (GDPR), where applicable

We do not sell personal data.

## 2. Data Controller

The Data Controller responsible for your personal data is:

Executive Director: Esmond Tweedie

Owner: Didier Membrez

Contact details:

Saint-Charles International School

Route de Belfort 10

2900 Porrentruy

Switzerland

secretariat@saint-charles.ch

+41 32 466 11 57

## 3. What Personal Data We Collect

We may collect and process the following categories of personal data:

- |                                   |   |
|-----------------------------------|---|
| a) Identification Data            | - Application information   |
| - Parent/guardian name            |   |
| - Student name                    | d) Website & Technical Data   |
| - Date of birth                   | - IP address  |
| - Nationality                     | - Browser type  |
|                                   | - Pages visited   |
| b) Contact Data                   | - Device information  |
| - Email address                   | - Cookies and usage analytics   |
| - Telephone number                |   |
| - Postal address                  | e) Special Category Data (Where Necessary)                            |
|                                   | - In limited cases (e.g. admissions or safeguarding), we may collect: |
| c) Admissions & Registration Data | - Health information  |
| - Academic background             | - Learning support needs  |
| - School reports (if submitted)   |   |
| - Enquiry details                 |   |

Such data is processed only where legally permitted and with appropriate safeguards.

## 4. How We Collect Data

We collect data:

- Through website enquiry and registration forms
- Through admissions documentation
- By email, phone or in-person communication

- Through cookies and website analytics tools

## 5. Why We Process Personal Data

We process personal data for the following purposes:

- Responding to enquiries
- Managing admissions and registration
- Communicating with prospective families
- Maintaining student records
- Safeguarding and welfare
- Administrative and operational management
- Legal and regulatory compliance
- Website performance analysis
- Marketing communications (where permitted)

Saint-Charles only uses personal data for the purposes for which it was originally collected, unless a compatible purpose arises and we are legally permitted to do so.

## 6. Legal Basis for Processing

Depending on the context, we rely on:

- Consent
- Contractual necessity (e.g. admissions process)
- Legal obligations under Swiss and education law
- Legitimate interests (e.g. managing enquiries, improving website performance, maintaining records)

For sensitive data, we rely on:

- Explicit consent
- Legal safeguarding obligations
- Substantial public interest in education

## 7. Website Operator and Data Processor

Our website is operated by UBIQ, who acts as a data processor on our behalf.

UBIQ may process personal data for:

- Website hosting
- Technical maintenance
- Data analytics
- Behavioural analysis to improve user experience

UBIQ processes data only according to our instructions and under appropriate data protection agreements.

## 8. Marketing Communications

We may contact you if:

- You submitted an enquiry form
- You requested information
- You began an admissions process

You may opt out of marketing communications at any time by emailing: [secretariat@saint-charles.ch](mailto:secretariat@saint-charles.ch).

We do not sell or rent personal data.

## 9. Data Sharing

We may share personal data with:

- IT service providers
- Website and analytics providers (including UBIQ)
- Legal, accounting or regulatory authorities
- Education authorities where legally required

All third parties are required to maintain confidentiality and data security.

## 10. International Data Transfers

If personal data is transferred outside Switzerland or the EU/EEA, appropriate safeguards such as Standard Contractual Clauses or equivalent protections will be implemented.

## 11. Data Retention

We retain personal data as follows:

- Enquiry and prospect data: up to 3 years after last meaningful contact
- Admissions records: in accordance with education regulations
- Student records: as required by Swiss law
- Website analytics: according to system retention settings

Data is deleted or anonymised when no longer necessary.

## 12. Automated Decision-Making

Saint-Charles International School does not use fully automated decision-making that produces legal or similarly significant effects.

Website analytics tools may use automated processing for statistical analysis, but no automated profiling is used for admissions decisions.

## 13. Your Rights

Under applicable data protection laws, you have the right to:

- Access your personal data
- Correct inaccurate data
- Request erasure (where legally permissible)
- Restrict processing
- Object to processing
- Withdraw consent
- Request data portability

To exercise your rights, contact: [secretariat@saint-charles.ch](mailto:secretariat@saint-charles.ch).

## 14. Data Security

We implement appropriate technical and organisational security measures to protect personal data from:

- Unauthorised access
- Accidental loss
- Alteration
- Disclosure

Access to personal data is limited to authorised personnel and contracted processors.

## 15. Complaints

If you are not satisfied with how your personal data has been handled, please contact us first at: [secretariat@saint-charles.ch](mailto:secretariat@saint-charles.ch).

You may also lodge a complaint with the Swiss Federal Data Protection and Information Commissioner (FDPIC).

## 16. Policy Review

The policy will be reviewed annually by the administration of Saint-Charles.