

ISC Research Community Privacy Policy

This Privacy Policy is edited by ISC Research, a limited company having its registered office at 2/3 The Old Barn, Wicklesham Lodge Farm, Faringdon SN7 7PN, UK and registered in England under the number 5160590 (hereafter, the “**Data Controller**”).

The Data Controller offers a Community Platform (hereafter, the “**Platform**”) to its users which have subscribed on the Platform and as such have a user account (hereafter, the “**Users**”). The Community Platform provides users with features enabling networking opportunities, access to group discussions and events to share ideas and good practice with peers within the international schools sector. The Platform is available at the following url address <https://community.iscresearch.com>

The Data Controller uses a solution called “Hivebrite”, which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

In this regard, the Data Controller collects and processes User’s personal data in accordance with the Privacy and Cookie policy.

The Data Controller is particularly aware and sensitive with regards to the respect of its Users privacy and personal data protection. The Data Controller commits to ensure the compliance of the processing it carries out as data controller in accordance with the Data Protection Law.

Data Protection Law means the GDPR and the UK GDPR as well as any legislation and/or regulation implementing or created pursuant to the GDPR, the UK GDPR, the CCPA and the e-Privacy Legislation, or which amends, replaces, re-enacts or consolidates any of them, and all other national applicable laws relating to processing of personal data and privacy that may exist under applicable law. The Data Controller has put in place an appropriate privacy and cookie policy to be fully transparent on how the personal data of Users are processed within the use of the Platform and services provided.

GDPR (the General Data Protection Regulation) means Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free

movement of such data, and repealing Directive 95/46/EC, and its European and national implementing laws.

UK GDPR means Regulation (EU) 2016/679 as it forms part of the laws of the UK by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.

This privacy policy is intended for the Users of the Platform of the Data Controller.
Date of last update: 03 February 2023

ARTICLE 1. COLLECTED PERSONAL DATA

1.1 When subscribing on the Platform

When subscribing to the Platform, the User is informed We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows for the purpose of creating a user account:

Identity Data includes first name, last name, username or similar identifier, marital status, title, current role (job title and organisation name),

Contact Data includes email address and telephone numbers.

Optional data includes location, citizenship, social media links, information regarding members' education and professional experience.

The User is informed that it is not possible to access the Platform without providing the Identity Data strictly necessary to create an account and authenticate the User.

1.2 During the use of the Platform

The User may validly publish, at its own initiative, any content on the Platform which shall be kept by the Company. This may include:

- posts
- events

The User is aware that when using the Platform, the User may decide to provide « sensitive data » within the meaning of Data Protection Law, for example, data

revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

ARTICLE 2. THE PURPOSE OF THE DATA PROCESSING

We have set out below the purposes for which we process the information described in this notice and the legal basis we rely on for each processing purpose. Data Protection Law requires us to have at least one “legal basis” for processing personal data. The legal bases applicable to the personal data to which this notice relates are:

Performance of contract: Where the processing is necessary for us to perform a contract that you are party to, or to take steps at your request prior to entering a contract, such as a contract for the sale of our products to you;

Legal obligation: Where the processing is necessary for compliance with a legal obligation to which we are subject;

Consent: If you have given your consent to us processing your personal data for specified purposes.

Purpose	Legal basis
<i>Creation and management of a user account;</i>	Consent
<i>Providing the User with all functionalities of the Platform, meaning:</i> <ul style="list-style-type: none"> • <i>Sending invitations for events organized by Data Controller or other Users, if the User has accepted to receive such invitations;</i> • <i>Sending offers (including commercial) from the Data Controller or its partners if the User has accepted to receive such offers.</i> • <i>Invite the User to events organized by the Platform</i> 	Performance of Contract

<i>Management of data subjects rights according to the Personal Data Legislation. Storage of User personal data;</i>	Legal Obligation
<i>Management of transactions through the Platform</i>	Consent and Performance of Contract
<i>Management of prospection operations:</i> <ul style="list-style-type: none"> • <i>Sending email prospect campaigns in the Name of ISC Research and/or its commercial partners</i> • <i>Sending newsletters in the Name of ISC Research and/or its commercial partners</i> 	Consent
<i>Making statistics in order:</i> <ul style="list-style-type: none"> • <i>to improve the quality of the services proposed by the Platform;</i> • <i>improve the usage functionalities of the Platform;</i> 	Consent
<i>Making statistics regarding the effective use of the Platform;</i>	Consent
<i>Making statistics regarding the different levels of activity on the Platform.</i>	Consent
<i>Enable the synchronization of the User's LinkedIn profile;</i>	Consent

ARTICLE 3. DATA RETENTION PERIOD

The Data Controller informs the User that the personal data related to the User Account is retained only during the length of the User's subscription on the Platform.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Following the termination of said subscription, the data collected upon the

subscription as well as the content published by the User on the Platform shall be deleted after a period of 30 days.

ARTICLE 4. DATA TRANSFERS

The Users' data are stored in the United Kingdom (the "UK") and the EEA by the Data Controller and its trusted service providers. However, depending on the processing, the Users' data may also be transferred in a country outside the UK and EEA, to our trusted service.

When transferring data outside the UK or EEA, the Data Controller ensures that the data is transferred in a secured manner and with respect to the Data Protection Law. When the country where the data are transferred does not have a protection comparable to that of the UK or EU, the Data Controller uses "appropriate or suitable safeguards".

When the service providers to whom personal data are transferred, are located in the United States, these transfers are governed by the standard data protection clauses adopted by the Commission.

Please contact us at dpo@iscresearch.com if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EEA.

ARTICLE 5. COMMITMENT OF THE DATA CONTROLLER

The Data Controller commits to process User's personal data in compliance the Data Protection Law and undertake to, notably, respect the following principles:

- Process User's personal data lawfully, fairly, and in a transparent manner;
- Only collect and process the Users' data for the strict purpose as described under Article 2 of the present privacy policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Do the best efforts to ensure that the personal data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the

purposes for which they are processed, are erased or rectified without delay;

- Keep personal User's data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Users' data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

ARTICLE 6. EXERCISE OF THE USERS' RIGHTS

The User is duly informed that it disposes at any time, depending on the legal basis of the processing, a right to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.

When processing is based on User's consent, the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

The User can exercise its rights by sending an email to the following address dpo@iscresearch.com or by mail at the following address 2/3 The Old Barn, Wicklesham Lodge Farm, Faringdon, OXON SN7 7YR provided that the User justifies his/her identity.

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data is collected can lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

ARTICLE 7. COOKIES

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the Data Controller Cookie Policy: <https://community.iscresearch.com/page/cookie-policy>

ARTICLE 8. RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS' DATA

Only **authorized persons working for the Data Controller** can access your personal data. The Data Controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of User's personal data.

The Data Controller also uses **trusted service providers** to carry out a set of operations on his behalf for hosting and payment services. The Data Controller can also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

The Data Controller only provides service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. The Data Controller does his best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

The Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of ISC Research, its customers or employees.

List of the main service providers:

Service Provider	Service	You can consult the privacy policy by clicking on the following link:
KIT UNITED 44 rue la fayette 75009 Paris France	HIVEBRITE solution	https://hivebrite.com/privacy-policy
Stripe 510 Townsend Street San Francisco CA 94103, USA	Payment Service	https://stripe.com/fr/privacy
Google Cloud Platform Gordon House, 4 Barrow St, Dublin, Ireland	Hosting of all data and content produced / provided by the User, as well as images, profile pictures and backups	https://cloud.google.com/security/privacy/
Amazon AWS 38 avenue John F. Kennedy, L-1855, Luxembourg		https://aws.amazon.com/compliance/gdpr-center/
Sentry 32 Howard, Thorne Street San Francisco, CA 94107 USA	Production and storage of error logs enabling our developers to correct the code	https://sentry.io/privacy/
Sendgrid 375 Beale Street, Suite 300, San Francisco, CA 94105 USA	Sending of emails from the Platform	https://api.sendgrid.com/privacy.html

Hivebrite, Inc. 16 Nassau St, New York, NY 10038, USA	Customer support for the Platform	https://hivebrite.com/privacy-policy
Salesforce UK Limited, village 9, floor 26 Salesforce Tower, 110 Bishopsgate, London, UK, EC2N 4AY	ISC Research CRM	https://www.salesforce.com/company/privacy/