

DATA PRIVACY MANUAL

Date: September 9, 2025 Document No.: ISM-DPM-2025-003

REVISED PRIVACY NOTICE FOR WEBSITES

Introduction

International School Manila (ISM) is committed to protecting your privacy and acknowledges the confidentiality of the personal information you voluntarily provide. This Privacy Notice explains our practices concerning the collection, use, processing, storage, and retention of your personal data. We detail why we collect your information, how we intend to use it, with whom it may be shared, and how it is protected. This notice also outlines your rights as a data subject, including how you can access, amend, or request the deletion of your information.

Why We Collect Your Personal Data

ISM collects, uses, and processes your personal information only when it is reasonable and necessary for a specific and declared purpose

For Employment:

- To evaluate your suitability for employment.
- To communicate with you regarding your application.
- Once hired, to process your data for payroll, benefits, allowances, tax processing, and retirement benefits.
- Once hired, to manage performance and career development.
- Upon separation, to process your final payout and exit clearance.

For Parents and Students:

- To facilitate responses to your inquiries and arrange school tours.
- To assess your priority status based on our admission policy.
- To evaluate students' suitability for our academic programs.
- To complete application and enrollment requirements, including medical assessments, campus IDs, school accounts, uniforms, educational materials, shuttle services, and access to school activities and facilities.
- To provide parents with a billing account and access to school facilities.
- Once enrolled, to evaluate a student's academic progress and behavioral data to help faculty develop a tailored educational program, including academic teaching, guidance counseling, and extracurricular activities.
- Upon withdrawal or graduation, to process data for exit clearance and finalize school records.

For Alumni:

- To provide updates on ISM's programs, marketing initiatives, promotions, events, and fundraising activities.
- To collect personal stories and experiences you choose to share with the school.

In general, we also collect your data to:

- Comply with our legal obligations and requirements from government agencies like the NPC, BIR, HDMF (Pag-IBIG), PhilHealth, SSS, and others.
- · Fulfill legal and regulatory requirements.
- Satisfy the requirements of audit and privacy compliance assessments.
- Perform other processing or disclosures required by law.

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How and what type of personal data do we collect?

We collect personal data primarily from application forms submitted on our website and from other documents you provide through official school email addresses.

The types of personal data we collect depend on the purpose of your application. Common types include:

- Basic personal information: Full name, nickname, home address, email address, contact details, and account credentials.
- Sensitive personal information: Age, date of birth, nationality, gender, and occupation.
- Other records: Photo; Educational background (e.g., transcripts of records, recommendation letters);
 Employment records; Medical records and diagnostic reports for learning support; Family background (e.g., names of spouses and children); Financial details; Valid identification cards and licenses;
 Current salary, statutory obligations, and other benefits.; Please ensure the personal data you submit is accurate, complete, and up-to-date.

To Whom We Disclose Your Personal Data

We will not share your data with a third party without your consent, except as required by law. By providing your consent, you authorize ISM to disclose your personal data to accredited, affiliated, or non-affiliated third parties, whether local or foreign, for the specific purposes stated in this notice. This includes situations where such disclosure is reasonably necessary or required by law, such as for a criminal investigation or in response to a court order.

We may disclose your personal data to the following entities:

- Our affiliates, partner companies, organizations, or agencies, including their subcontractors or prospective business partners who act as our service providers and contractors for specific, authorized purposes.
- Law enforcement and government agencies when required by law.
- All third parties with whom we share your data are bound by a data sharing agreement to protect
 your information and use it only for the purposes disclosed in this Privacy Notice.

How We Protect Your Personal Data

We are committed to the security of your personal data. We strictly enforce our Privacy Notice and have implemented a comprehensive security program with organizational, physical, and technical measures to protect your data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Our safeguards include:

- Storing your personal data on a secured server behind a firewall.
- Deploying encryption on computing devices.
- Restricting access to your data to qualified, authorized personnel who are under strict confidentiality obligations.
- Using secure connections to process and store data.
- It is your responsibility to protect against unauthorized access to your password and computer. Be sure to log out when using a shared computer.

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Where and How Long We Keep Your Personal Data

ISM retains your personal data in our files located in the Philippines or on cloud servers for as long as necessary to fulfill the purpose for which it was collected. Your personal data may also be retained if required to resolve disputes, or if we are legally obligated to do so. In such cases, we will limit the retained data to what is necessary for the specific purpose. We will securely dispose of your personal data once the retention period has passed.

On-Campus Privacy

For the safety of our students, faculty, and staff, we use security measures that involve the collection of personal data on campus. This includes:

- Visitor Logbook: All visitors are required to sign a logbook, providing their name and purpose of visit.
- CCTV Surveillance: We use closed-circuit television (CCTV) cameras throughout the campus. CCTV
 footage is generally retained for up to 29 days but may be kept longer for an ongoing investigation or
 as required by law.

Amendments to Our Privacy Notice

ISM reserves the right to amend this Privacy Notice at any time without prior notice. Any changes will be posted on our website to ensure you are always informed about what information we collect, how we use it, and under what circumstances it is disclosed. We encourage you to check our Privacy Notice periodically for updates.

Use of Cookies

This website uses cookies, which are small information files stored by your browser on your hard drive. We use a third-party service, Google Analytics, to analyze web traffic data. Cookies help us determine if you are a returning or first-time visitor and compile anonymous statistics on how our visitors interact with our website. This information helps us improve your user experience. The data collected includes:

- IP addresses and domain names
- Browser type and configuration
- Language settings
- Geo-location

- Operating system
- Referring website
- Pages and content viewed
- Duration of visits

This information is collected anonymously, and you cannot be identified. You can disable cookies in your browser settings, but this may affect the functionality of our website.

Your Rights as a Data Subject

Under the Data Privacy Act of 2012, you have the following rights concerning your personal data:

- Right to be Informed: The right to be informed that your personal data will be, is being, or has been
 processed
- Right to Object: The right to object to the processing of your personal data.
- Right to Access: The right to reasonable access to your personal data.
- Right to Rectification: The right to correct or update your personal data if it is inaccurate or incomplete.
- Right to Erasure or Blocking: The right to request the removal, destruction, or blocking of your personal data.

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INTERNATIONAL SCHOOL MANILA

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- Right to Portability: The right to receive a copy of your personal data in a portable format.
- Right to Damages: The right to be indemnified for damages caused by a violation of your data privacy rights.
- Right to File a Complaint: The right to file a complaint with the National Privacy Commission (NPC).

To exercise your rights or if you have any inquiries, feedback, or complaints, please contact our Data Protection Officer (DPO).

Data Protection Officer (DPO): dpo@ismanila.org

International School Manila

Address: University Parkway, Fort Bonifacio, Taguig City 1634, Philippines

Telephone: (632) 8840-8400

If your request is not granted or sufficiently addressed, or if you feel your personal data has been misused, maliciously disclosed, or improperly disposed of, you may file a formal complaint with the NPC. However, we recommend you inform our DPO of your intention to file a complaint before proceeding.