

	Privacy Notice for Website	Document No. DPODP030201A.01
		Date: October 2, 2025

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, the legal basis for processing, the specific ways we intend to use it, with whom it may be shared, how it is protected, and the risks involved. 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. The legal basis for processing is noted below for each purpose.

Target Group	Purpose for Processing (Primary Use)	Legal Basis for Processing
Employment	To evaluate suitability for employment; to communicate regarding application; to process payroll, benefits, allowances, tax, and retirement; to manage performance and career development; to process final payout and exit clearance.	<i>Contractual necessity (to enter into or fulfill an employment contract) or Legitimate Interest (for performance management).</i>
Parents & Students	To facilitate inquiries and school tours; to assess priority status and academic suitability; to complete application and enrollment requirements (e.g., medical assessments, IDs, accounts); to provide billing and access to facilities; to evaluate academic progress and behavioral data for a tailored educational program.	<i>Consent (for non-contractual enrollment parts); Contractual necessity (to fulfill services under the enrollment contract); Legitimate Interest (for safety, security, and academic assessment).</i>
Alumni	To provide updates on ISM's programs, promotions, events, and fundraising; to collect personal stories and experiences you choose to share with the school.	<i>Consent (for marketing and sharing stories).</i>
General	To comply with our legal obligations and requirements from government agencies (e.g., NPC, BIR, SSS); to fulfill legal and regulatory requirements; to satisfy audit and privacy compliance assessments; to perform other processing or disclosures required by law.	<i>Legal Obligation; Legitimate Interest (for compliance and audit).</i>

How and What Type of Personal Data 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 (Primary Data): Full name, nickname, home address, email address, contact details, and account credentials.

Sensitive personal information (Secondary Data): Age, date of birth, nationality, gender, and occupation; 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.

Other records: Photo; Educational background (e.g., transcripts of records, recommendation letters); Employment records.

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 explicit consent, except as required by law.

Recipient Identity	Extent of Transfer (Local or Foreign)	Purpose for Transfer
Affiliates, partner companies, organizations, or agencies, including their subcontractors or prospective business partners.	Local or Foreign transfer is possible.	To act as our service providers and contractors for specific, authorized purposes related to the services you requested (e.g., payment processing, cloud hosting).
Law enforcement and government agencies (e.g., NPC, BIR, SSS, PhilHealth).	Local (Philippines).	As required by law, such as for a criminal investigation, statutory compliance, or in response to a court order.

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.

Risks and Protection Measures

Risks Involved at Any Stage of Processing

Although we employ security measures, the processing of personal data inherently involves risks. These potential risks include: unauthorized access or breach leading to identity theft or financial loss, loss or corruption of data due to system failure, unintended disclosure during transfer to third parties, and malicious misuse of information by unauthorized personnel. We maintain that these risks are mitigated by the controls detailed below.

Protection Measures

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.

Protection Measure Category	Specific Safeguards to Address Risks
Technical Measures	Storing your personal data on a secured server behind a firewall; Deploying encryption (e.g., Transport Layer Security - TLS) on computing devices and for data in transit; Using secure connections to process and store data.
Organizational Measures	Restricting access to your data to qualified, authorized personnel who are under strict confidentiality obligations; Implementing mandatory training on data protection policies; Requiring Data Sharing Agreements with all third-party recipients.
Physical Measures	On-Campus Privacy measures include the use of a Visitor Logbook and CCTV Surveillance for safety and security; Secure physical storage of hard-copy documents within locked cabinets and restricted areas.

It is your responsibility to protect against unauthorized access to your password and computer. Be sure to log out when using a shared computer.

Where and How Long We Keep Your Personal Data

Manner of Storage

ISM retains your personal data in our files located in the Philippines or on cloud servers.

Retention Periods and Basis

We retain your personal data for as long as necessary to fulfill the purpose for which it was collected.

Data Type or Status	Retention Period/s	Basis for Retention Period
General Applicant Data	Typically, one (1) year from the last date of contact.	Necessary for future recruitment needs and dispute resolution.
Employee/Student Records	Typically, ten (10) years after separation or graduation.	Compliance with statutory requirements (e.g., BIR tax records) and academic record verification.
Data Retained for Disputes	Until the dispute is formally resolved.	Legal necessity to resolve disputes or if legally obligated by a court order.
CCTV Footage	Generally, retained for up to 29 days.	Safety and security, may be kept longer for an ongoing investigation or as required by law.

Secure Disposal

We will securely dispose of your personal data once the retention period has passed. Disposal methods include shredding for physical documents and permanent deletion or anonymization of electronic records to ensure data cannot be reconstructed or recovered.

Automated Access and Use of Cookies

Methods Utilized for Automated Access

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, and 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, especially in cases of direct marketing or processing based on legitimate interest or consent.

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.

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).

How to Exercise Your Rights and Contact Information

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

Address: International School Manila, 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.

Document History

Version #	Date	Changes		Prepared by	Approved by
		Section	Details		
1			New Document	D. Toze	
2	Sept 09, 2025	Revised to align with the DPA Manual's update.		O. Fabian	W. Brown
3	October 2, 2025	Revised to align with the DPA Manual's update.		O. Fabian	W. Brown