Privacy Notice – (How we use pupil information)

In this document the **Holmes Chapel Comprehensive School & Sixth Form**, is referred to as 'we' or "our" Pupils are referred to as "you" or "your"

To run the school and help learning and achievement, we collect and use information about pupils.

Much of the information we collect is classed as 'personal data' and our use of it is covered by a set of rules called the General Data Protection Regulation (GDPR). These rules were brought into UK law in the Data Protection Act 2018.

This document tells you more about:

- The information we collect
- What we use the information for
- How your information is stored and how long we keep it
- What rights you have to the information

What Information do we collect and use about pupils?

We collect many different categories of information, for example:

- Personal details
- Contact details
- Family details
- Admission records
- Attendance records
- Absence details
- Behaviour records
- Behaviour management records
- Academic progress
- Examinations details
- Trips and visits
- Extra-curricular activities
- Photographs of you
- Images from CCTV
- Files, messages, documents and artwork you have produced
- Records of discussions with members of staff
- Records of your use of school IT systems

In some cases, we will also have:

- Information about consultation with other professionals
- Information about support provided for your learning
- Records of any school equipment loaned to you

Some of the personal data we keep is given greater protection and is known as special category personal data. Special category data includes information about your ethnic origin, religious affiliation as well as any information about health conditions or medical treatment.

Special category data that we collect and use about you includes

- Information about health conditions
- Information about sickness related absences
- Information about your ethnic origin

Why we collect and use this information

We use the information

- To support the admissions process
- To support your learning
- To monitor and report on your academic progress
- To enable you to take part in exams
- To provide appropriate pastoral care
- To help us manage any health conditions that may affect your learning
- To comply with our legal obligations to share information
- To check the quality of our services

The legal basis for using this information

Based on the reason we are using your personal data; our use will be legal due to one of the following:

- Informed consent given by your parent or legal guardian [Article 6(1)(a)]
  For example: The use of your photographs on our website

- To meet a legal requirement [Article 6(1)(c)]
  For example: Providing information for the Department for Education Census

- To protect the vital interests of you or someone else [Article 6(1)(d)
  For example: Giving your family details to emergency services

- Delivering a public task [Article 6(1)(e)]
  For example: Recording your attendance at school each day

Where we use special category data, our use is legal due to one of the following reasons:

- Explicit informed consent given by you or your parent or legal guardian [Article 9(2)(a)}
  For example: Using your fingerprints to identify you to our IT systems
- We are legally obliged to collect and use it [Article 9(2)(b)]
  For example: Information about your ethnic origin or any disability
- To protect the vital interest of you or someone else [Article 9(2)(c)]
  For example: Giving detail of health conditions to the emergency services

- Because it is part of delivering a public service [Article 9(2)(g)]
  For example: Holding data on any medical condition so that we can help you manage it

Storing your personal data

Most of the personal data that we collect, and use is added to your Educational Record. This record is kept while by the Academy.

Some personal data is kept for different lengths of time. For example:

- Records of your admission to the school are kept permanently. We do this as pupils often ask us to confirm the dates that they attended one of our Academies.
- Detailed information about your daily attendance is kept for three years
- Information about free school meals is kept for the current year and 6 years afterwards

If you'd like to know how long we keep a specific piece of personal data, please contact the Data Protection Administrator whose details can be found at the end of this Privacy Notice.

Sharing your personal data

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so or when you have given your consent.

Examples of people we share personal data with are:

- Family, associates and representatives of the person whose personal data we are processing who are authorised to receive the data
- Cheshire East Council
- The Department for Education
- The National Pupil Database
- Examining bodies
- Healthcare, social and welfare organisations
- Police forces and Courts
- Voluntary and charitable organisations
- Our suppliers and service providers
- Press and the media

Where we share your personal data with someone who is a supplier or service provider, we have taken steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

Your rights to your personal data

You have rights relating to the personal data that we collect and use. Depending on the legal basis we are using the information you have different rights. If we are using your personal data based on your consent, you can withdraw that consent and we will stop using that personal data. Withdrawing your consent will need to be recorded in writing, please contact the Data Protection Administrator.

The right to be informed:

If you ask us, we must tell you if we are collecting or using your personal data.

If we are collecting or using your personal data, you have:

The right of access to your personal data

You have the right to view the personal data that we hold about you, to receive a copy of the data and to be given more information about the data including any transfer to countries who do not fall under the requirements of the GDPR.

Some information we hold cannot be accessed in this way. If you ask for information that is not available, there may be other ways of accessing it and we can help you.

To have access to your personal data we will need to collect details of what you want and in the first instance you can contact the Data Protection Administrator whose details can be found at the end of this Privacy Notice.

Other rights

You also have rights to ask us to correct inaccurate personal data, to ask us to stop using it or to object to us using it. For some data you may have to right to ask us to erase it, to provide it in an electronic format that you can give to someone else. For some personal data if we are subjecting it to automated decision making then you have the right to object to this as request that a person is involved.

You will be given full details of these rights if you request access to your personal data or you can ask the Data Protection Administrator.

Parents or Guardian's rights to access your personal data

If you are under 12 and request access to your personal data, we will usually ask your parents or guardian to confirm that we can release it to you. Your parents or guardian can also ask to see the personal data we hold about you directly.

If you are over 12 and request access to your personal data, we will release this to you. Parents or guardians do not have an automatic right to access this data and we will seek your consent to share if required.

Consent for Biometric Identification

There are extra rules for giving consent for the use of biometric information. This means things like fingerprints used in a catering system. For us to use this information we must have permission from a parent before we use your biometric data while you are under 18. Once you reach the age of 13 you have the right to withdraw the consent to use the biometric data.

Who to contact:

The school is the has the responsibility to ensure that your personal data is protected. It is called the **data controller.** All members of staff work for the data controller.

We recommend that you contact the Data Protection Administrator:

Name of Person: Neil Barnett

email address: DPA@HCCS.INFO

Contact number: 01477 410 500

Contact address: Selkirk Drive, Holmes Chapel, Cheshire CW7 4DX

Schools are also required to have someone called a Data Protection Officer or DPO. The DPO advises the school about issues to do with data protection, but can also help you, if you have a problem.

Our Data Protection Officer is:

Name of DPO:	**GDPR Sentry Limited**
email address:	**Support@gdprsentry.com**
Contact number:	**0113 8042035**
Contact address:	**Unit 434, Birch Park, Thorp Arch Estate, Wetherby, LS23 7FG**

If you have any questions about this privacy notice, please contact the data protection administration or the Data Protection Officer.

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/ or call 0303 123 1113.

Privacy Notice – (How we use parent information)

In this document the **Holmes Chapel Comprehensive School & Sixth Form**, are referred to as 'we' or "our" Parents are referred to as "you" or "your"

Much of the information we collect is classed as 'personal data' and our use of it is covered by a set of rules called the General Data Protection Regulation (GDPR). These rules were brought into UK law in the Data Protection Act 2018.

This document tells you more about:

- The information we collect
- What we use the information for
- How your information is stored and how long we keep it
- What rights you have to the information

We have also included a section about your rights in relation to your children who attend the school. A full Privacy Notice for pupils is available on request

What Information do we collect and use about parents?

We collect many different categories of information, for example:

- Personal details (for example: name, date of birth, national insurance number)
- Contact details (for example: address, telephone number, email address)
- Family details (for example: details of other children, emergency contacts)
- Admission requests
- Records of communications (for example: emails, phone messages and letters)
- Records of visits to school (for example: time and date, the person you visited)
- Photographs of you or images on CCTV
- Banking details (A credit or debit card registered with our payment system)
- Records of transactions in our payment system
- Consent for school visits and extra-curricular activities

In some cases, we will also have:

- Information about consultation with other professionals
- Information about your employment and financial situation
- Information about any care or contact orders relating to your child(ren)

Why we collect and use this information

We use the information

- To support the admissions process
- To support learning for your child(ren)
- To maintain a safe environment for our pupils
- To provide appropriate pastoral care
- To enable you to pay for activities for your child(ren)
- To enable you to pay for school meals for your child(ren)

- To enable free school meals to be provided
- To comply with our legal obligations to share information
- To ensure your health and safety if you visit school
- To keep you up to date with news about the school

The legal basis for using this information

Depending on the purpose, our use of your information will be legal due to one of the following:

- Informed consent given by you [Article 6(1)(a)]
  For example: The use of banking information in our payment service

- To meet a legal requirement [Article 6(1)(c)]
  For example: Providing your contact details to the local authority

- To protect the vital interests of you or someone else [Article 6(1)(d)
  For example: Giving your contact details to emergency services

- Delivering a public task [Article 6(1)(b)]
  For example: Recording communications about your child(ren) being absent from school

Storing your personal data

Some of the personal data that we collect, and use, is added to the Educational Record for your child(ren).

Other data that we collect from you will be stored in paper files or on our computer systems.

Some personal data is kept for different lengths of time. For example:

- Records of admission to the school are kept permanently. We do this as pupils often ask us to confirm the dates, they attended the Academy.
- Correspondence about a child's absence is kept for the current year and 2 years afterwards
- Records of your visits to schools are kept for the current year and 6 years afterwards

If you'd like to know how long we keep a specific piece of personal data, please contact the Data Protection Administrator whose details can be found at the end of this Privacy Notice.

Sharing your personal data

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so or when you have given your consent.

Examples of people we may share personal data with are:

- Family, associates and representatives of the person whose personal data we are processing who are authorised to receive the data

- Cheshire East Council
- The Department for Education
- Healthcare, social and welfare organisations
- Police forces and Courts
- Voluntary and charitable organisations
- Our suppliers and service providers

Where we share your personal data with someone who is a supplier or service provider, we have taken steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

Your rights to your personal data

You have rights relating to the personal data that we collect and use. Depending on the legal basis we are using the information you have different rights. If we are using your personal data based on your consent, you can withdraw that consent and we will stop using that personal data. Withdrawing your consent will need to be recorded in writing, please contact the Data Protection Administrator.

The right to be informed:

If you ask us, we must tell you if we are collecting or using your personal data.

If we are collecting or using your personal data, you have:

The right of access to your personal data

You have the right to view the personal data that we hold about you, to receive a copy of the data and to be given more information about the data including any transfer to countries who do not fall under the requirements of the GDPR.

Some information we hold cannot be accessed in this way. If you ask for information that is not available, there may be other ways of accessing it and we can help you.

To have access to your personal data we will need to collect details of what you want and in the first instance you can contact the Data Protection Administrator whose details can be found at the end of this Privacy Notice. You will also need to supply us with standard information to verify your identity.

Other rights

You also have rights to ask us to correct inaccurate personal data, to ask us to stop using it or to object to us using it. For some data you may have to right to ask us to erase it, or to provide it in an electronic format that you can give to someone else. For some personal data if we are subjecting it to automated decision making then you have the right to object to this as request that a person is involved.

You will be given full details of these rights if you request access to your personal data or you can ask the Data Protection Administrator.

Access to personal data about your child(ren)

Where your child(ren) is/are under the age of 12 it is usually assumed that they are not able to make decisions about their personal data. That right is usually given to parents or a guardian. To access the personal data relating to your child(ren) you will need to follow the same procedure as you would to access your own personal data.

If your child requests access to their personal data, then we will normally refer that request to you for confirmation before releasing the data.

Once your child(ren) reach(es) the age of 12, in most cases they are assumed to be able to make their own decisions about their personal data. This means that we will not refer any request for access to their own data. Similarly, if you wish to make a request for data about you child(ren) we may refer that request to them for confirmation.

It is worth knowing that under the terms of the Data Protection Act (2018) parents do not have an automatic right to access information about their child(ren) through a subject access request.

Who to contact:

The school has the responsibility to ensure that your personal data is protected. It is called the **data controller.** All members of staff work for the data controller.

We recommend that you contact the Data Protection Administrator:

Name of Person: Neil Barnett

email address: DPA@HCCS.INFO

Contact number: 01477 410 500

Contact address: Selkirk Drive, Holmes Chapel, Cheshire CW7 4DX

Schools are also required to have someone called a Data Protection Officer or DPO. The DPO advises the school about issues to do with data protection, but can also help you, if you have a problem.

Our Data Protection Officer is:

Name of DPO:	**GDPR Sentry Limited**
email address:	**Support@gdprsentry.com**
Contact number:	**0113 8042035**
Contact address:	**Unit 434, Birch Park, Thorp Arch Estate, Wetherby, LS23 7FG**

If you have any questions about this privacy notice, please contact the data protection administrator or the Data Protection Officer.

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/ or call 0303 123 1113.

Appendix A - 3rd Parties

ALPS	ALPS: The School may send information about learners to a third party organisation called ALPS for the provision of software products delivered over the internet.The information required by ALPS includes the pupil first name, surname, gender, DOB, Ethnicity, disaadvantaged, exam results. ALPS's services are valuable in helping educational organisations to monitor and improve the quality of education they provide by allowing them to analyse student and subject performance in great depth.
AMI Education	AMI: This software is used to provide our cashless catering system. AMI Education Solutions software products hold Personal Data sourced from the school MIS (or created manually by the school), the data is used to verify the identity of an individual at the point of service delivery via computer terminals, EPOS terminals and Coin & Note revaluation units. The data is stored on school servers and AMI only have access to this data in order to provide support for the system when authorised by the school. The categories of data subject to whom the Personal Data relates to are Pupils, Students, Employees and any authorised visitors that require access to related services. The types of Personal Data to be processed includes: - Surname, Legal Surname, Forename, Legal Forename, Registration Group, Year, Tutor, Date of Birth, Gender, Free Meal Eligibility, UPN, Admission Number, MISID, Photograph, Biometric template*, Dietary needs, Transactional data Purchases, credits, and refunds. These are related to personal records using a system generated identifier. We may share this information with our online payment provider Tucasi (details listed under Tucasi). *Biometric Data will only be stored with consent. The Biometric database is encrypted using AES256 - an industry standard and highly secure technology. All communications between applications and the database are also encrypted using AES256. Each school has its own secret unique group of AES256 encryption keys, which means that the database and any backup of its contents can only be accessed on licensed hardware, and the encrypted data is only available to the registered licensee. AES256 is the same encryption technology that is used in Microsoft's BitLocker disk drive encryption, and is certified by the National Security Agency of America to be used to protect Top Secret information.
Awarding Bodies	AQA, Pearsons, WJEC/Eduqas, OCR, Cambridge Assessment Admissions Testing: These awarding bodies are used to provide national examinations at various levels including GCSE, Entry Level, A Level.
BROMCOM	BROMCOM: Bromcom is our main Management Information System that is used to store all student data in order for us to fulfill our statutory obligations in the provision of education for your child. Beyond the delivery of statutory data to the DFE through mechanisms such as the school and workforce census, Bromcom does not automatically share your data with anyone else and does not grant third parties access. Any third parties will need to liaise with the school to be given permission to access your data and permission will only be granted if it is needed to improve the quality of education and care of your child.The Bromcom database is securely stored and access is managed through our provider who is ISO 9001, 14001 and 27001 accredited and PCI DSS compliant. With strict information security protocols, your systems are protected around the clock in Bromcom's secure data centres with access to technical support 24/7/365.
CPOMS	CPOMS: Safeguarding recording information. Due to the sensitive nature of safeguarding requirements it is necessary for us to be able to share all data we hold in our MIS alongside specification information on any safeguarding incidents. CPOMS is registered with the UK Information Commissioner's Office both as a Data Processor for customers' data and as a Data Controller for their own company's data. They are also accredited for both ISO 27001 and UK Government 'Cyber Essentials' which are reviewed each year. They also subject their systems and networks to regular independent penetration testing to ensure the security of our schools' data.
Evolve	Learning outside the classroom, school trips: The School may send information about learners to a third party organisation called EVOLVE for the risk assessment and storage of information regarding the provision of learning outside the classroom.The information required by EVOLVE includes the pupil first name, surname, gender, DOB, disaadvantaged, medical details, dietary requirements and contact details of parents/carers. Evolve's services are valuable in helping educational organisations to risk assess and safeguard our students when learning outside of the school. This information may be shared with the Local Authority when additional risk assessment is required for residential trips.

GL Assessment	GL Assessment: As part of our assessment programme we use several sets of student data to monitor your child's progress and inform our teaching. One of the tools we use is the CAT4 Test/ Progress Test Series from GL Assessment to give us an acute understanding of a student's potential. This data is considered alongside any other assessments made throughout the year, formal or informal, to inform our teaching
Google	Google: Google provides email, document storage and online classroom facilities to enhance the quality of teaching and learning. Google will implement and maintain technical and organizational measures to protect Customer Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. Security Measures include measures to encrypt personal data; to help ensure ongoing confidentiality, integrity, availability and resilience of Google's systems and services. Google may transfer data outside of the EU but is fully compliant under GDPR regulations by the signing of a model clauses contract approved by the European Commission.
Groupcall	Groupcall - Groupcall is used to securely transfer data from our MIS to our 3rd parties using Xporter on Demand (XoD). XoD will proactively cache a limited set of data based on the data areas we authorised (see each 3rd party for details of the data that is shared) . This cache is AES encrypted with a unique key before leaving the school. Expired cache data is securely erased automatically after 30 days, or sooner by request. Caches are refreshed daily, or on demand if required.
Inspire	Inspire: teacher cover suppliers. Cover supervisors who are covering a lesson for an absent member of staff have limited access to data on the class they are supervising. This may include student names, DOB, assessment data, SEN needs. None of this information is taken off site or stored by Inspire. It is only available to the supervisor at the time of their deployment.
MintedBox	MINTclass is a powerful suite of products for schools which includes a seating planner that enables teaching staff to automatically create and manage their classroom seating plans. Information, including first name, surname, gender, ethnicity, SEN code, grades and other factors such as pupil premium, about each student is displayed in an easy to use manner. Information is extracted from the school Management Information System (MIS) using Groupcall's industry leading and secure Xporter software. The data is securely uploaded to MINTclass using industry standard SSL encryption.
PiXL	PIXL: Pixl provides classroom strategies and resources to improve best practice and to raise standards of teaching and learning for students The types of student personal data processed will usually include names, login information, school email addresses. For some applications, year, class, and attainment data are processed. Best practice security techniques, such as anonymisation and encryption, are applied to transfers of personal data between the Member School and PiXL, between all data servers and between servers and end point devices.
PRIME	Prime: Health and Safety incident recording system. This system is used to record incidents where an accident has happened on the school premises and has involved a fracture or anything where a hospital visit straight from school has been necessary. The data recorded will be name, gender, DOB and details of the accident. This is a requirement of the Health & Safety Executive.
Renaissance Learning - Accelerated Reader	Acclerated Reader: This is a literacy programme to help students advance their literacy skills. The online system stores information including name, DOB, gender, main language,Pupil Premium, Free School Meals, Assessment data on reading tests. Renaisance Learning stores the information in the US and is certified under the EU-US Privacy Shield.
School Cloud Systems	Parents Evening Booking System: This online system is used by parents to book appointments to see students teachers. The system contains information on students including name, DOB and timetabled classes and contact information for parents/carers. They employ appropriate technical and organisational security measures for the types of data they store. Their managed hosting provider, UKFast, is ISO 27001 & ISO 9001 accredited and ranks amongst the very best in the industry.
SchoolComms	Schoolcomms: This software is used for home school communications. The information required by Schoolcomms includes forename, surname, gender, DOB, assessment data, behaviour, achievement, attendance, timetable information and contacts information. Schoolcomms have introduced appropriate technical and organisational measures to protect the confidentiality, integrity and availability of your personal information during storage, processing and transit. They are a Level 2 PCI-DSS certified organisation and operate an ISO27001 compliant security programme.

SISRA	SISRA Limited: The School may send information about learners to a third party organisation called SISRA Limited for the provision of software products delivered over the internet.The information required by SISRA Limited includes the pupil first name, surname, gender, ethnicity, SEN code and other factors such as “Free School Meals”, “Gifted & Talented” and “Children in Care”. SISRA’s services are valuable in helping educational organisations to monitor and improve the quality of education they provide by allowing them to analyse student, class and subject performance in great depth. In addition to the above, the school may request the services of one or more of SISRA’s Data Consultants to visit the school. The purpose of the visit may require authorised access to the school’s management information system (MIS), which could mean access to sensitive personal data. The school will fully supervise any access while the SISRA Data Consultant is on the premises and remain responsible for any data processing that the SISRA Data Consultant might perform. Data Protection Officer, SISRA Limited, Egerton House, 2 Tower Road, Birkenhead, Merseyside. CH41 1FN.
Sodexo	Sodexo: Sodexo are our catering company. In order to provide meals to our students Sodexo staff have access to our cashless catering system and associated data (see AMI Education listed above). This data is only accessible when they are on the school site. Sodexo share dietary requirements with their nutritionist so they can meet the requirements of our students. If payment is made to Sodexo by cheque then copies of these cheques are kept by Sodexo for a period of 5 years. Daily transaction records, including online payments are also kept by Sodexo for 5 years.
Survey Monkey	Survey Monkey: Survey Monkey is used to send surveys to staff, students and visitors. While we don't share your information with Survey Monkey directly some of the question responses may contain personal information. When this data is entered into a survey response it will be stored by Survey Monkey once the response is submitted. Survey Monkey will also record additional information such as Cookies and IP addresses of their visitors to ensure the surveys function as intended. SurveyMonkey’s information systems and technical infrastructure are hosted within world-class, SOC 2 accredited data centers. Physical security controls at their data centers include 24x7 monitoring, cameras, visitor logs, entry requirements, and dedicated cages for SurveyMonkey hardware. Data is held on US servers and Survey Monkey contractually comply with the EU-US Privacy Shield to allow transfer of the data outside the EU.
Team Satchel (Teachercentric Ltd)	Show My Homework: This software is used to record and share with parents and students homework set by classroom teachers improving standards of teaching and learning for students The types of student personal data processed will usually include names, school email addresses, timetable information and parental names . Satchel are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, they have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information they collect online.
Tempest Photography	School official photographers: This company carries out official school photos. The data that is shared with Tempest in order to identify the students when uploading photos onto our school MIS is the stutents tutor group and admission number. At Tempest, they have a secure portal, using the latest 256-bit data encryption, specifically for these purposes. They provide schools with instructions on how to provide any information that has to be shared via their secure portal in a compliant manner.
Tucasi	Tucasi - Schools Cash Office helps the school to manage payments coming into the school and is linked with SCOPay the online payment system used by parents. Tucasi stores Names, DOB, Address, Pupil Premium and contact details. Tucasi also stores the balance for the cashless catering system and a record of items that have been purchased. In order to provide these links Tucasi may share some information to the cashless catering system (see AMI education). It is important to understand that Tucasi Limited does not take or store your financial data. This website allows users to select items that need to be paid for, but payment processing is handled by WorldPay based on information parents enter when making a payment.
Twitter	Twitter: The school uses a number of Twitter accounts to share information, celebrate achievements and blog about trips and events. The information posted on Twitter may include first names and, where consent is given, photographs. The information posted on Twitter is public and as such may be copied and shared outside of our control.

Vericool	Vericool Ltd is a provider of cashless catering and registration systems to schools. Vericool has a comprehensive internal policy on GDPR and has conducted a detailed audit together with staff training to ensure compliance. No third party data is held by Vericool Ltd. All data for their systems is held in an encrypted sql on the school central database, to which Vericool does not have access without the explicit permission of the school. For purposes of support Vericool engineers may require authorised access to the onsite Vericool database this access is supervised by school staff. On very rare occasions and with the explicit permission of the school Vericool may bring some data back to Vericool. In the unlikely event this was necessary we have a dedicated and secure server. This server has a range of security measures including it not being connected to the internet. All data is hard deleted as soon as it is finished with and it is their policy to physically destroy the hard disk once a year. They do not share any information with any third parties and conduct no marketing or data analysis using it.
WIX	Wix: The school uses Wix to build and host our website. All information published on our website is publicly available and may be copied and shared outside of our control. We may publish firstnames, and where consent is given, photographs. When you visit Wix they may record information such as Cookies and IP addresses. Wix.com is certified under the EU-US Privacy Shield Framework and the Swiss-US privacy Shield Framework as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, and therefore adheres to the Privacy Shield Principles.