



Lycée International Xavier's

Privacy Policy

All personal information that Lycée International Xavier (hereinafter "LIX", the "School", "we" or "us") handles is collected, retained, and processed under relevant statutes. We are doing our best to protect your personal information which is subject to this policy. LIX has established the following privacy policy to protect users' rights and interests and to resolve any complaints regarding personal information.

- LIX provides services under the condition that the user has agreed to these regulations. If the user agrees to these regulations, this policy will be applicable when it provides services and users use services.
- LIX may, if deemed necessary, make additions or modify services in the event of additions, deletions, or modifications to the Privacy Policy due to the enactment or amendment of laws, changes in government policy, changes in LIX's internal policies, or changes in security technology. The reason for and details of a change in the Privacy Policy will be announced on the LIX website at least seven days before any change. Should the user disagree with any modified services, the user may terminate their account. If the user continues to use the services after the modifications, LIX will consider the user to have consented to the modifications.
- Matters not stated in this regulation shall be in accordance with the Telecommunications Business Act; Korea Internet Safety Commission Regulations and Code of Ethics; Copyright law and Computer Programs Protection Act and other related regulations.

Article 1

Purposes of Processing Personal Information

LIX processes personal information for the purposes stated below.

1. Management of student records, ID card or certificate issuance, processing admissions/withdrawal/transfer applications and requests, sports and afterschool activities program management, supporting school events, alumni relations, and school development.
2. Accounts for classroom digital learning and assessment services.
3. Access to student academic information by parents, school bulk email, and short message service for school operations, dissemination of information, and activity registration.
4. Management of student health records, book loans/returns, and student billing.
5. Management of school bus riders.
6. Control of vehicle entry to LIX.
7. Prevention of unauthorized charges by third parties, and lunch account monitoring.



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8. Prevention of unauthorized access by third parties, school health and safety review, and law enforcement investigations.
9. Supporting virtual education, facilitating student/parent and school communication, archiving audio/visual of school activities and events, child protection, school safety review, and law enforcement investigations.

Article 2

Scope

“Website and Online Platforms” means LIX’s official website and the computerized data processing tools that are used by LIX’s staff as IT tools for administrating the School (especially registration, re-enrolment, billing, or other usual processes of schooling) and that are used by families as part of their communication with LIX. Online platforms include Seesaw, edited by Seesaw Learning, Inc., Sacoche edited by Sésamath, Gepi edited by Thomas Belliard, Google Workspace, edited by Google, and Eduka, edited by Eduka Software Ltd. LIX, as well as the provider of the School’s platform, firmly undertake to respect a set of rules of good conduct in order to guarantee the confidentiality of all data you provide to us.

Online Platforms	Collected information	Person who has access	Period of retention
Eduka	Students’ personal information (name, birth date, gender, nationality, address), a photo, parents’ and immediate family’s information (name, contact information, nationality, special forms, passport data & image (occupation and workplace (optional))), and student records. * Sensitive personal information: Social security number, nationality, a special form including health, physical, physiological, and behavioral information and characteristics. * Personally identifiable information: resident or alien registration number, and passport number.	Access to student academic information by parents, school bulk email and short message service for school operations, dissemination of information, and activity registration.	Permanent
Gepi	Middle & high school students: name, birth date, a photo, disciplinary measures, absences, lateness, and homework. Evaluations and report card comments (high school only)	Middle & high school teachers: student name, disciplinary measures, and a photo	School year
Sacoche	Primary & middle school students: name, birth date, a photo, disciplinary measures, evaluations and report card comments	Primary & middle school teachers: student name, disciplinary measures, and a photo	School year, except evaluations max 3 years
Grr	Staff: name and school email address	Staff	School year



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Gipi	Staff: name and school email address	Staff	School year
Pmb	Students: name and school email address, birth date, and grade. Staff: name and school email address	Librarian	Graduation or the end of the school year in case of withdrawal

* Some information may be modified by the school with parental consent.

Article 3 Process and Retain Personal Information

Retained by	Purpose	Basis of Retention	Collected information	Period of retention
School Administration	Management of student records	Article 25 of the Elementary and Secondary Education Act, Article 21 of Enforcement Rules of the Elementary and Secondary Education Act, Article 3 of the Rules on the Preparation and Management of School Life Records.	Students' personal information (name, birth date, gender, nationality, address), a photo, parents' and immediate family's information (name, contact information, nationality, special forms, passport data & image (occupation and workplace (optional))), and student records. * Sensitive personal information: Social security number, nationality, a special form including health, physical, physiological, and behavioral information and characteristics. * Personally identifiable information: resident or alien registration number, and passport number.	Permanent
	Management of human resources, and administrative processing, including for potential visa formalities	Consent by information holder (user)	Employment contract and professional development certificates obtained while employed at LIX	Permanent
			Name, birth date, place of birth, nationality, ID and visa information, postal address and postal code, personal email address, personal telephone number, education/curriculum information (current and past) and related marks, diplomas, and professional development certificates, marital status, if needed, health certificates, if	1 year after withdrawal



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			needed in case of absence, profession and previous employers.	
Education Technology	Accounts on classroom digital learning and assessments services.	Annual consent by information holder (user)	Personal details (name, gender, and birth date if required for age verification).	Graduation or the end of the school year in case of withdrawal
Student Healthcare Services	Management of student health records	Article 9 of Regulations on student medical test, Article 14 of Guidelines on electronic process & management	Personal details (name, birth date, gender, name of parent/guardian, address, and emergency contacts), student health information (previous medical history, current medical issues, and medications in use), records of vaccinations, and records of medical checkups. * Sensitive personal information: Social security number, student health information (previous medical history, current medical issues, medications in use), records of vaccinations, records of medical checkups, and doctor's notes.	5 years after graduation or the end of the school year in case of withdrawal
Homeroom teachers	Management of student records	Article 25 of the Elementary and Secondary Education Act, Article 21 of Enforcement Rules of the Elementary and Secondary Education Act, Article 3 of the Rules on the Preparation and Management of School Life Records.	Students' personal information (name, birth date, gender, nationality, and address), parents' and immediate family's information (name, contact information, and student's passport data and image). * Sensitive personal information: Nationality, a special form including health, physical, physiological and behavioral information and characteristics. Relevant healthcare information. * Personally identifiable information: passport number.	1 year
Supervising teacher	Management of student records	Article 25 of the Elementary and Secondary Education Act, Article 21 of Enforcement Rules of the Elementary and	* Sensitive personal information: Nationality, a special form including health, physical, physiological and behavioral information and characteristics. Relevant healthcare information.	Graduation or in case of withdrawal



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		Secondary Education Act, Article 3 of the Rules on the Preparation and Management of School Life Records.		
Library Services	Management of book loans/returns	Article 38 of the Libraries Act	Student name, grade, gender, barcode number, a list of books on loan, and email address. Teacher name and email address.	Graduation or in case of withdrawal
Vehicle Entry	Control of vehicle entry to LIX	Article 25, Paragraph 1 of the Personal Information Protection Act, Consent by information holder (user)	Employee name, contact number, and vehicle information (license number, car make and model)	2 months after withdrawal
CCTV	Prevention of unauthorized access by third parties, school health and safety review, law enforcement investigations	Article 25, Paragraph 1 of the Personal Information Protection Act,	Video footage	Up to 1 month after date of recording
Activity Recordings	Archiving visual of school activities and events	Consent by information holder (user)	Student's name, grade, and photos	Permanent

Article 4

Provide Personal Information to a Third Party

1. The use or provision of personal information by LIX should be limited to the minimum extent to perform its duties, and should not be provided to other organizations or others for purposes other than holding personal information files unless otherwise specified below that information is to be provided to or used by a third party.
2. LIX provides personal information to third parties as follows under Article 17 and 18 of the Personal Information Protection Act, with the consent of the information holder and according to the provisions of the relevant laws.



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3. Data held or processed overseas is done in accordance with article 39-12 of the PIPA.

Third party	Purpose	Legal grounds	Details of personal information	Period of retention
Cafeteria food services, CJ Freshway	Prevention of allergic reaction, and management of school cafeteria	Consent by information holder (user)	Student name, grade, allergy information, and dietary requirements	1 year

Article 5

Matters concerning Outsourced Processing of Personal Information

LIX outsources the processing of our users' personal information for the following purposes below. It retains ownership of the data and as such our period of retention follows the user consent terms.

Organization	Details of outsourcing	Details of personal information	Period of retention
Google	Google Workspace Cloud service accounts	Student name and birth date	1 year after graduation or the end of the school year in case of withdrawal
SeeSaw	Learning management system, Communication, and Portfolios	Student name and grade	End of primary school year in case of withdrawal
Cristal Web (LDE)	Textbook loan management system	Student name, birth date, grade, and a list of textbooks	Permanent. Records are archived after graduation or the end of the school year in case of withdrawal. All archived records become anonymous after a period of 3 years.
Académie de Montpellier	Application for exams (Brevet and Baccalauréat)	Student name, birth date, place of birth, medical information, candidate number, and disciplinary measures.	

Article 6

Security and Storage of Personal Information

The personal information we collect is stored in a secure environment. Server storage may be located outside of Korea. The people working at LIX, as well as the providers of the platforms, are required to respect the confidentiality of users' information. To ensure the security of users' personal information, we use the following technical measures:

- Access to the platform via secure connection (HTTPS)



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- Access management: only authorized personnel are able to access the data
- Network monitoring, intrusion detection, and defense software
- Encrypted computer backups with a key known only to the platform provider and that can only be restored on the original platform
- Your connection to the platform is protected by a login/password combination
- The server hosting the school platform is protected by a firewall.

We are committed to maintaining a high level of confidentiality by incorporating the latest technological innovations to ensure the confidentiality of users' transactions and provide a reasonable assurance of security. We will endeavor to protect personal information from unauthorized access, disclosure, use, destruction, loss or divulgence. However, despite these security measures, the use of computer networks has inherent risks and there is no absolute guarantee of security on the Internet.

Article 7 Right and Responsibility of Information

As a user, one can exercise the following rights under Article 4 of the Personal Information Protection Act:

1. Request to browse personal information
2. Request to suspend processing or rectify and suspend incorrect information
3. Request to delete personal information from the School's database
4. Determine whether or not to consent as well as the scope of consent regarding the processing of such personal information

If any user or his/her legal representative or a person who has been authorized to act on behalf of the user (a person who has submitted a power of attorney in accordance with the attached Form 11 to the Enforcement Decree of the PIPA) requests to access, rectify or delete his/her personal information via email or a phone call, LIX will process the request and confirm the completion thereof within 10 days. Meanwhile, the request for access to or suspension of the processing of a user's personal information may be limited under Articles 35(5) and 37(2) of the PIPA.

Article 8 Personal Information Handling Departments

File Name	Browsing Location	Phone Number
Admissions application, Academic records, Personal contact information (Parents), Personal information (Faculty / Staff)	Secretary	02-396-7688
Student financial accounts	Accounting	02-396-9891
Student health records	Nurse	02-330-3203
Student school email accounts	IT	02-396-7688



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Library user information	Library	02-396-7688
School bus rider list	Bus/Transportation	02-396-7688
Website / Newsletters / Yearbook	Public Relations	02-396-7688

Article 9 Disposal of Personal Information

1. In principle, LIX disposes of personal information immediately when the purpose of processing personal information has been achieved.
2. The procedure and method of personal information disposal are as follows.

1) Disposal Procedure

Personal information (or personal information files) that need to be disposed of will be disposed of following LIX's internal disposal procedures. This will be conducted after obtaining approval from the person in charge of the personal information.

2) Disposal Method

- Personal information in LIX's processed electronic files is destroyed by a technological method so that the record cannot be reproduced.
- Personal information printed on paper is shredded with a shredder or destroyed through incineration.
- Personal information held and processed by third parties is removed according to the contract terms and legal requirements of the data processor's host country.

Article 10 Disclaimer for the Use of LIX's Website

By accessing LIX's website, users agree to the following terms of use. If users do not agree with those terms of use, they must discontinue using our website. LIX reserves the right, at its discretion, to change, add or remove portions of these terms of use at any time, so we encourage users to check this page regularly for changes.

LIX takes the utmost care in ensuring the accuracy of the content of its website. However, LIX does not assume any liability for, and does not warrant that, the information included in the website is accurate or complete, or that it is free from errors, or that it will always remain available. LIX disclaims all warranty, express or implied, about the content of its website, and excludes all liability to anyone for any loss or damage that may be caused by any error or omission, whether such error or omission results from negligence, accident or any other cause.

Article 11 Restrictions on the Use of the Content on LIX's Website

The contents on LIX's website and all copyright and other intellectual property rights therein belong to LIX. All other use of LIX's website and its contents, including modification, publication,



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transmission, creation of derivative works, reproduction or incorporation into another website is not permitted without LIX's written consent.

Article 12

Operation and Management of CCTV (Closed-Circuit Television)

LIX operates security cameras to ensure the safety and security of users' access to the school and for the prevention of fire in accordance with Article 25, Paragraph 1 of the Personal Information Protection Act. LIX uses 9 cameras for its 24-hour CCTV monitoring system outside the entrances of the premises of the school.

In order to protect personal video information processing equipment and deal with related requests, the video information processing equipment manager and access authority are designated below.

- Access authority: Guards station, 02-396-7688

LIX securely manages the video information through physical and technological restricted access controls. The LIX Guard Station where personal video information is monitored and played is designated as a restricted area.

In the event that an individual makes a written request to the video information manager, to view or confirm the existence of personal video information, LIX will take the necessary actions without delay according to legal and internal procedures.

Article 13

Applicable legislation

We undertake to comply with the following legislative provisions, both technically and organizationally:

- PIPA (Personal Information Protection Act, 개인정보보호법) coming into force on September 30, 2011.

Article 14

Policy update

This policy was revised on November 22, 2023.

- Date of announcement: November 22, 2023 / Date of enforcement: November 22, 2023