Horizons Education

GDPR Policy

GDPR Policy for Horizons AP Ltd.

Introduction

At **Horizons AP Ltd.**, we are committed to safeguarding and respecting your privacy. This General Data Protection Regulation (GDPR) policy outlines how we collect, process, and protect your personal data in compliance with GDPR (EU Regulation 2016/679). This policy applies to all employees, contractors, clients, and third parties interacting with our company.

1. Data Protection Principles

We are committed to ensuring that your personal data is:

- Processed lawfully, fairly, and transparently
- Collected for specified, legitimate purposes and not further processed
- Accurate and up-to-date
- Kept in a form which permits identification of data subjects for no longer than necessary
- Processed in a manner that ensures appropriate security of personal data

2. Types of Personal Data Collected

We may collect and process the following types of personal data:

- Contact information: name, address, phone number, email address
- Employment data: job title, employment history, performance records, salary details
- Identification data: passport, national ID number, driving license
- Health data (where applicable and necessary for employment or legal purposes)
- Financial data: bank account details, tax information
- IT data: login credentials, network access records, etc.

3. Purposes of Processing Personal Data

Personal data is collected and processed for the following purposes:

- To manage the employment relationship (e.g., payroll, benefits administration, performance reviews)
- To ensure compliance with legal obligations (e.g., tax laws, health and safety)
- To provide necessary services or support to employees, clients, or partners
- To safeguard company assets and ensure operational efficiency

4. Legal Basis for Processing Personal Data

In accordance with the GDPR, personal data will be processed only if there is a valid legal basis, including:

- Consent: When the data subject has given explicit consent to process their personal data
- Contractual necessity: To fulfill contractual obligations with employees, clients, or service providers
- Legal obligation: To comply with applicable laws and regulations
- **Legitimate interests**: For purposes related to our legitimate interests, provided that these do not override the data subject's rights and freedoms

5. Data Sharing and Transfers

We may share personal data with:

- Third-party service providers who help us with operational tasks, such as payroll, IT services, and legal compliance
- **Government authorities** where required by law (e.g., tax authorities, law enforcement agencies)
- Internal departments for legitimate business purposes (e.g., HR, IT, finance)

When sharing personal data with third parties, we ensure they comply with applicable data protection laws and have appropriate measures in place to protect your data.

6. Data Security

We take appropriate technical and organizational measures to ensure the security of personal data, including:

- Encryption of sensitive data
- Access control to restrict unauthorized access to personal data
- Regular audits and assessments of data protection practices
- Ensuring staff receive adequate training on data protection

7. Data Retention

Personal data will only be retained for as long as necessary to fulfill the purposes for which it was collected. After this period, the data will be securely deleted or anonymized. The retention period may vary depending on legal or regulatory requirements.

8. Your Rights Under GDPR

As an individual, you have the following rights concerning your personal data:

- Right to access: You have the right to request a copy of the personal data we hold about you.
- **Right to rectification**: You have the right to request corrections if the data we hold is inaccurate or incomplete.
- **Right to erasure**: You have the right to request the deletion of your personal data, subject to certain conditions.
- **Right to restriction of processing**: You may request that we limit the processing of your personal data in certain circumstances.
- **Right to data portability**: You have the right to request your data in a structured, commonly used, and machine-readable format.
- **Right to object**: You may object to the processing of your personal data, particularly where processing is based on legitimate interests.

9. How to Exercise Your Rights

To exercise any of your rights under the GDPR, please contact our Data Protection Officer (DPO) at:

• **DPO Name**: [DPO Name]

• Email Address: schooloffice@horizonseducation.org

• **Phone Number**: 07961950494

We aim to respond to all requests within 30 days. If your request is complex, we may extend the time frame by an additional 60 days.

10. Changes to This Policy

We may update this policy from time to time to reflect changes in our practices, legal requirements, or the services we offer. We will notify you of any significant changes.

11. Contact Us

If you have any questions or concerns regarding this policy or how we handle your personal data, please contact us at:

• Company Name: Horizons AP Ltd.

• Email Address: schooloffice@horizonseducation.org

• **Phone Number**: 07961950494

This policy ensures that all personal data processed by **Horizons AP Ltd.** is handled in accordance with GDPR standards and to protect the rights and freedoms of data subjects.