

IMEDRA SCHOOL DATA PRIVACY POLICY

Introduction

At IMEDRA SPHERE, the protection of personal data is a key priority and an essential condition for building trust with our customers, employees, partners, suppliers, and users. We are committed to respecting individuals and ensuring the security of their data in compliance with applicable legal frameworks and best practices in data protection.

This policy outlines the commitments IMEDRA SPHERE implements in its daily operations to ensure responsible use of personal data while upholding individuals' rights, freedoms, and dignity. It serves as a reference for our employees, partners, clients, and stakeholders to understand how we collect, process, and protect personal data, as well as the rights and choices available to data subjects.

This policy applies to all personal data processing activities conducted by IMEDRA SPHERE and its authorized processors.

Legal Framework

IMEDRA SPHERE complies with national and international data protection regulations, including but not limited to:

- The Tunisian Constitution of 2022, which guarantees respect for privacy and the protection of personal data.
- Convention 108 of the Council of Europe, ratified by Tunisia under Law No. 42 of May 30, 2017.
- Organic Law No. 63 of July 27, 2004, concerning the protection of personal data.
- Decree No. 3003 of November 27, 2007, outlining the functioning of the National Data Protection Authority (INPDP).
- Decree No. 3004 of November 27, 2007, establishing conditions for declaring and authorizing personal data processing.
- Additional INPDP deliberations regulating data processing, including video surveillance, health data, and cross-border data transfers.

Key Definitions

- **Personal Data:** Any information, regardless of its form or medium, that directly or indirectly identifies a natural person.
- **Data Processing:** Any operation performed on personal data, including collection, storage, organization, modification, usage, transmission, or destruction.

- **Sensitive Personal Data:** Data requiring additional protection, including racial or genetic origin, religious beliefs, political opinions, union membership, or health-related information.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Subject:** Any individual whose personal data is processed.
- **Processor:** A third party acting on behalf of the data controller in processing operations.
- **Recipient:** Any entity receiving personal data for further processing.
- **Third Party:** Any person or entity other than the data subject, recipient, controller, or processor.
- **The Authority:** The National Data Protection Authority (INPDP), established under Law No. 63 of 2004.

Principles of Data Protection

IMEDRA SPHERE adheres to the following core principles in processing personal data:

A. Lawfulness, Fairness, and Transparency

Personal data is processed lawfully, fairly, and transparently. Data subjects are informed about the purpose of data collection, the legal basis, and their rights.

B. Purpose Limitation

Data is collected for specific, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.

C. Data Minimization

Only data necessary for the intended purpose is collected and processed. Superfluous or outdated data is deleted or anonymized.

D. Accuracy

IMEDRA SPHERE ensures personal data is accurate, up-to-date, and corrected when necessary.

E. Storage Limitation

Data is retained only as long as necessary for its intended purpose, after which it is securely deleted or anonymized.

F. Integrity and Confidentiality

IMEDRA SPHERE implements appropriate security measures to protect data from unauthorized access, loss, destruction, or alteration.

5. RIGHTS OF DATA SUBJECTS

Data subjects have the following rights:

A. Right of Access

Individuals can request access to their personal data and obtain information on how it is processed.

B. Right to Rectification

Individuals can request correction of inaccurate or incomplete personal data.

C. Right to Erasure (Right to Be Forgotten)

Individuals can request the deletion of their data when it is no longer necessary or has been unlawfully processed.

D. Right to Object

Individuals can object to data processing for legitimate reasons unless the processing is required by law.

E. Right to Data Portability

When applicable, individuals can request a copy of their personal data in a structured format.

F. Right to Lodge a Complaint

Individuals can file a complaint with the National Data Protection Authority (INPDP) if they believe their rights have been violated.

Security Measures

IMEDRA SPHERE takes all necessary precautions to ensure the security and confidentiality of personal data, including:

- Implementing technical and organizational security measures.
- Conducting regular security audits and compliance checks.
- Encrypting sensitive data and securing data transfers.
- Restricting data access to authorized personnel only.

Data Processing on The Website

IMEDRA SPHERE's website collects user data in compliance with this policy. The processing includes:

- **Pre-registration Forms:** Data collected for processing applications.
- **Contact Forms:** Data used for responding to inquiries.
- **Cookies:** Used for website functionality and analytics, with user consent.
- **Live Chat:** Used for customer support, with data retained only as needed.
- **Social Media Links:** Managed by third-party platforms, subject to their privacy policies.

THIRD-PARTY DATA PROCESSING

When engaging third-party processors, IMEDRA SPHERE ensures:

- Processors comply with data protection laws.
- Data processing agreements are in place.
- Data is processed only for authorized purposes.

Policy Updates

IMEDRA SPHERE reserves the right to update this policy periodically. Updates will be communicated through our website.

Contact Information

For any inquiries regarding this policy or to exercise your rights, contact:

Data Protection Service (DPO) Email: imedrasphere@gmail.com