

LungA School Privacy and Handling of Personal Information Policy

Last updated 01/10/2024 (MRJ)

The purpose of this policy tells you how we treat your data. It describes how we aim to treat personal data with the utmost care, respect, and transparency, to protect the personal information of all participants and any other partners of the school, and to ensure data is handled in compliance with the General Data Protection Regulation (GDPR) and in accordance with current provisions of the Icelandic Act on Data Protection the Processing of Personal Data. This policy reflects the school's position that people should have the right to autonomy in managing their own personal information. This policy applies to all personal information collected, used, stored, and shared by LungA School.

Contact Information

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us. The Director of LungA School, Mark Rohtmaa-Jackson, is the school's data manager and we ensure that your personal data is processed in accordance with the law.

Contact person: Dr Mark Rohtmaa-Jackson

Address: LungA School, Austurvegur 4, 710 Seyðisfjörður, Iceland

Phone number: (+354) 547 5477

Mail: mark@lunga.is

Website: lungaschool.is

Media authorization

We do not share videos or photos of clearly identifiable participants without their consent. This includes posting on social media, the school's website or in any printed marketing or press materials. Consent is assumed where the participant(s) is delivering a public performance or where videos or photos are already public. However, participants can at any time withdraw their consent by writing to Mark Rohtmaa-Jackson.

We are not involved in targeted marketing on the basis of the data LungA School might hold about you. When LungA School markets our work, it is through external

companies with their own privacy policy, and the school does not share your data with these companies.

Collecting Data and Usage of Data

We collect, process and store only the personal data that is relevant to an individual's involvement in the school. We verify that the personal data we deal with about you is not incorrect or misleading. We also make sure to update your personal data where this is the case. LungA School is responsible for, and must be able to demonstrate, compliance with these principles.

- Any personal information will be processed lawfully, fairly, and in a transparent manner.
- Data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Personal information will be used solely for the purposes for which it was collected unless further consent is obtained. We hold only that personal information required to run a mailing list, process applications for the school programs and run these programs, and provide school services such as participant access to transcripts of academic achievement.
- Only the minimum amount of personal data necessary for the intended purpose will be collected. The purposes for data collection, data subject rights, and data retention periods will be clearly communicated.
- Personal data will be accurate and kept up to date.
- Data will be kept in a form which permits identification of data subjects for no longer than necessary.
- Personal information will be collected only with explicit, informed consent from the individual. We do not share any data or information held on participants, guests or members of staff with any individuals or companies without the clear and specific permission of those it pertains to. If for any reason we feel it would be useful to pass any of this information to a third party, you will be contacted first.
- Our website uses Google Analytics which allows anonymous statistics to help us understand web usage of the lungaschool.is website and can help to improve the website for future visitors. Statistics can include the country from where you are visiting, the webpage or search term you used to find the website, which pages you visited, which device and browser you used to access the website. Beyond Google Analytics we do not use cookies and

other tools to automatically collect information about you when you use our web channels, however third party service providers may do so when acting on our behalf. These include: Google Drive and Gmail, Podio and Meta (via Instagram and Facebook).

- Our website contains links to other sites. Please be aware that we are responsible for neither the content or privacy practices of other websites. We encourage all visitors to be aware when they leave lungaschool.is and to read the privacy statements of linked website as they may collect and process personally identifiable information differently.

Security Measures

Personal data will be processed in a manner that ensures appropriate security. We have adopted internal rules on information security that contain instructions and actions that protect your personal data against being destroyed, lost or modified, from unauthorised disclosure, and against unauthorised access or knowledge of them.

- Appropriate technical and organisational measures will be implemented to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- These measures include encryption, secure storage solutions, and regular security audits.

Processing, Retention and Disposal of Data

- We obtain your consent before processing any of your personal data or the purposes described above unless we have a legal basis for obtaining them. We inform you of such a basis and our legitimate interest in processing your personal data.
- Your consent is voluntary and you can withdraw it at any time by contacting us. Use the contact information above for more information.
- We will delete your personal data when it is no longer necessary for the purpose of the school, in accordance with GDPR guidelines.
- Data will be securely disposed of when no longer needed.

Collective Responsibility and Oversight

- We will regularly review and update this policy to ensure ongoing compliance with the GDPR.
- LungA School participants are encouraged to actively participate in the governance and oversight of data protection practices.

Awareness, Reporting and Redress

- We will provide regular training and resources to school staff about GDPR requirements and the importance of data protection.
- Employees of the school will be encouraged to stay informed about their rights and responsibilities regarding personal data.
- Any data breaches or concerns about data handling will be reported to the data manager.
- The school will address all reports promptly and take appropriate action to mitigate any issues.

What are your data protection rights?

LungA School would like to make sure you are fully aware of all of your data protection rights. LungA School will respond to requests from individuals to exercise their data rights promptly and within the timeframes set out in the GDPR. Every user is entitled to the following:

- Individuals have the right to access their personal information, rectify inaccuracies, and request erasure (the "right to be forgotten").
- Individuals can object to, or restrict, the processing of your personal data, under certain conditions, and have the right to data portability: the right to request that we transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us (see **Contact Information**).

Changes to our privacy policy

LungA School keeps its privacy policy and handling of personal data under regular review and any updates will be included in subsequent versions of this document. This privacy policy was last updated on 13 June 2024.

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that LungA School has not addressed your concern in a satisfactory manner, and the processing of your personal data infringes the Regulation or the provisions of the Data Protection Act in Iceland. you have the right to lodge a complaint with the [Data Protection Authority](#).