



THE OWL ACADEMY

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Data protection Policy

Last Updated: 29 October 2025

1. Introduction

Owl Academy VZW ("Owl Academy", "we", "us", "our") is committed to protecting the privacy and security of your personal data. As a non-profit organisation (NPO) providing educational facilitation, we process personal data in accordance with the EU General Data Protection Regulation (GDPR) and Belgian data protection laws.

This Data protection policy explains what personal data we collect, why we collect it, how we use it, and what rights you have as a data subject.

2. Who is the data controller?

The entity responsible for processing your personal data (the "Data Controller") is:

Owl Academy VZW
Sint Benedictusstraat 132
2640 Mortsel, Belgium
Enterprise Number: 1009.278.763
Email: enquiries@owl-academy.com

3. What personal data do we process?

We may collect and process the following categories of personal data concerning our students and their parents/guardians:

- **Identification and contact data:**
 - **Students:** Full name, date of birth, student ID.
 - **Parents/Guardians:** Full name, relationship to student, address, phone number, email address.
- **Academic and administrative data:**
 - Enrollment forms, grade level, academic history, progress reports, attendance records, disciplinary records, and communications between you and Owl Academy.
- **Financial data:**
 - Bank account details (IBAN/BIC) for fee payment, invoices, and payment status.
- **Media data:**
 - Photographs, videos, or audio recordings of students taken during school activities, *only* where we have your specific consent.
- **Special category (sensitive) personal data:**

- **Health data:** We may process medical records, allergy information, vaccination status, and information on learning, behavioural, or medical needs. We only process this data to ensure the health, safety, and well-being of the student and to provide appropriate learning support, and *only* with your explicit consent.

We may also process limited personal data (name, contact details, contract, invoices) from our self-employed consultants or volunteers.

4. Why do we process your data and on what legal basis?

We only process your personal data for specific purposes and when we have a valid legal basis to do so.

Purpose of Processing	Type of Data	Legal Basis (GDPR)
To manage your child's enrollment and perform our contractual obligations.	Identification, Contact, Academic, Financial	Art. 6(1)(b) - Contract: Processing is necessary for the performance of the Enrollment Agreement.
To ensure the health, safety, and safeguarding of your child and provide appropriate learning support.	Identification, Health data	Art. 9(2)(a) - Explicit Consent: You provide this consent at enrollment for us to process this sensitive data.
To comply with Belgian legal requirements, such as reporting school attendance to relevant authorities (e.g., AGODI).	Identification, Academic	Art. 6(1)(c) - Legal Obligation: Processing is necessary to comply with the law.
To communicate with parents/guardians about student progress, school events, and administrative matters.	Contact, Academic	Art. 6(1)(f) - Legitimate Interest: Our interest in maintaining effective communication and running our organisation.
To promote Owl Academy on our website, social media, or in marketing materials.	Media data (photos, videos)	Art. 6(1)(a) - Consent: We will only use this media if you have given us specific, affirmative consent.
To manage our financial administration (invoicing, payments).	Financial, Contact	Art. 6(1)(b) - Contract and Art. 6(1)(f) - Legitimate Interest.

5. Who do we share your data with?

We do not sell your personal data. We only share it when necessary and legally permitted.

- **Educational authorities:** We may be required to share student data with Belgian educational authorities (e.g., AGODI, CLB) to comply with our legal obligations regarding compulsory education.
- **External examination bodies:** We share necessary student data with external awarding bodies (e.g., Pearson, AQA, Florida Virtual School) to register students for exams and facilitate their qualifications.
- **Service providers (processors):** We may use third-party processors (e.g., IT providers, cloud storage, payment processors) who process data on our behalf. We have data processing agreements in place to ensure they protect your data.
- **Emergency services:** In a medical emergency, we may share relevant health data with medical professionals or emergency services to protect the vital interests of your child.

6. How long do we keep your data?

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected.

- **Student academic records:** Retained for the duration of the student's enrollment and for a defined period thereafter, in line with legal and administrative requirements.

- **Financial records:** Retained for a minimum of 7 years, as required by Belgian tax and accounting law.
- **Consent-based data (e.g., photos):** Retained until you withdraw your consent.

7. How do we protect your data?

We take appropriate technical and organisational measures to protect your personal data against unauthorized access, loss, or destruction. Access to sensitive data (such as medical records) is restricted to staff members who have a legitimate need to know.

8. What are your rights?

As a data subject, you have the following rights under the GDPR:

- **Right of access (Art. 15):** To request a copy of the personal data we hold about you.
- **Right to rectification (Art. 16):** To ask us to correct any inaccurate or incomplete data.
- **Right to erasure ('Right to be forgotten') (Art. 17):** To request the deletion of your data, subject to our legal or contractual obligations to retain it.
- **Right to restrict processing (Art. 18):** To request that we limit the processing of your data in certain circumstances.
- **Right to data portability (Art. 20):** To receive your data in a machine-readable format.
- **Right to object (Art. 21):** To object to our processing of your data based on legitimate interests.
- **Right to withdraw consent (Art. 7(3)):** Where we rely on your consent (e.g., for photos or health data), you have the right to withdraw that consent *at any time*. Withdrawing consent does not affect the lawfulness of processing based on consent *before* its withdrawal.

To exercise any of these rights, or to withdraw your consent, please contact us at: enquiries@owl-academy.com .

9. Complaints

If you have a concern about our processing of your data, you have the right to lodge a complaint with the Belgian Data Protection Authority (Gegevensbeschermingsautoriteit / Autorité de protection des données):

Website: <https://www.dataprotectionauthority.be/citizen>

Address: Drukpersstraat 35, 1000 Brussels, Belgium