



Granada Group of Schools Limited — Online Privacy Notice

1. About This Privacy Notice

Granada Group of Schools Limited ("Granada School", "we", "us" or "our") is committed to protecting the privacy of everyone who interacts with us, including prospective and current students, parents and guardians, staff, job applicants, contractors, and visitors to our campuses and websites.

This Privacy Notice applies to Granada Group of Schools Limited and its constituent schools and business units. It explains what Personal Information we collect, why we collect it, how we use and share it, and the rights you have in relation to it, in line with Kenya's Data Protection Act, 2019 ("DPA").

This Notice covers Personal Information collected through our websites, student and parent portals, admissions and enrolment processes, campus facilities (including CCTV and school transport), online fee payment systems, and any other interaction you have with Granada School.

Where our website links to third-party websites, this Notice does not extend to how those organisations handle your information. Please review the privacy notice of any third-party website before submitting personal information to it.

This Notice should be read alongside our website terms of use, enrolment agreements, and any other document describing how we process your Personal Information in specific circumstances.

2. Personal Information We Collect

The Personal Information we collect depends on your relationship with Granada School: whether you are a prospective parent, a student, a staff member, a supplier, or simply a visitor to our website. We group this information as follows:

- **Identity Data** – full name, date of birth, gender, nationality, national ID or passport number, photographs, and, for students, admission number and academic records.





- **Contact Data** – home and postal address, email address, and telephone numbers for students, parents/guardians and staff.
- **Financial Data** – bank account details, mobile money details, and payment card information used to pay school fees or other charges.
- **Transaction Data** – records of fee payments, refunds, and other payments made to or by Granada School.
- **Service Data** – academic performance, attendance, disciplinary records, co-curricular participation, and other information arising from your (or your child's) engagement with our educational programmes.
- **Security Data** – CCTV footage captured on our campuses, and records of access to our facilities.
- **Transport Data** – pick-up/drop-off points and, where applicable, location data relating to school transport services.
- **Technical Data** – IP address, login data, browser type, device information, and other technical details collected when you use our website or portals.
- **Usage Data** – information about how you interact with our website and student/parent portal.
- **Marketing and Communications Data** – your preferences regarding marketing communications from us.

Where information you provide includes special categories of personal data such as health information, religion, or ethnicity, we rely on your consent to process it, unless another lawful basis applies. Where such information relates to a child, we rely on the consent of a parent or legal guardian.

Granada School does not knowingly collect personal information directly from children without the involvement of a parent or guardian. Use of our website or portals by a minor is only permitted with the knowledge and consent of a parent or legal guardian.

We may also process aggregated or statistical data that does not, on its own, identify any individual. If such aggregated data is combined with other information in a way that makes it identifiable, we treat the combined data as Personal Information under this Notice.





3. How We Collect Your Personal Information

We collect Personal Information in three main ways:

Directly from you – for example, when you apply for admission, enrol a child, complete a form, communicate with us by email or phone, or use our website or portals to submit information.

Passively, through your device – when you visit our website or use our portals, we automatically collect certain Technical Data and Usage Data through your browser or device.

From third parties – we may receive information about you from previous schools, referees, background-check providers, government agencies, or other third parties, and we treat this information with the same care as information collected directly.

4. How We Use the Information We Collect

We use your Personal Information only for the purposes for which it was collected, or a purpose compatible with it. These purposes include:

1. Assessing and processing admissions and enrolment applications.
2. Administering academic programmes, assessing performance, and maintaining student records.
3. Operating our campuses, facilities, and school transport services.
4. Processing school fees and other payments and maintaining financial records.
5. Complying with our statutory obligations, including reporting to the Ministry of Education, Kenya Revenue Authority, and other regulators.
6. Recruiting and managing staff, including verifying references and conducting background checks.
7. Communicating with students, parents/guardians and staff, and responding to enquiries.
8. Sending marketing or informational communications about Granada School, where you have not opted out.



- 
9. Maintaining campus security, including through CCTV monitoring.
 10. Operating, securing, and improving our website and portals.
 11. Detecting, investigating, and preventing fraud or misuse of our systems.
 12. Protecting our legal rights, including in connection with any dispute or legal claim.

If we intend to use your Personal Information for a new purpose not covered above, we will only do so where that purpose is compatible with the original purpose, or where we have another lawful basis to do so, and we will inform you accordingly.

5. Sharing of Your Personal Information

We do not sell your Personal Information, and we will not disclose it for commercial gain. We may, however, share it in the following circumstances:

- With service providers who support our operations – such as our student information system provider, payment processors, IT and hosting providers, and transport service providers – under agreements that require them to protect your information to a standard at least equal to this Notice.
- With regulatory or governmental bodies, including the Ministry of Education, Kenya Revenue Authority, and the Office of the Data Protection Commissioner, where required by law.
- With other schools or institutions, where necessary for a student's transfer or continuing education.
- With our professional advisers (lawyers, auditors, insurers) where necessary for their services to us.
- Where necessary to protect the rights, property, or safety of Granada School, our students, staff, or others.
- Where required to comply with a legal obligation, court order, or law enforcement request.

Any third party we share information with is required to use it only for the specified purpose and in accordance with our instructions.

6. Cross-Border Transfer

Some of the service providers we use (for example, cloud hosting or software providers) may store or process Personal Information outside Kenya. Where this happens, we take steps to ensure that your information continues to receive an adequate level of protection, through contractual safeguards or other mechanisms recognised under the Data Protection Act.

You may contact our Data Protection Officer for further information about any specific transfer of your Personal Information outside Kenya.

7. How We Store and Retain Information

We hold Personal Information only for as long as necessary to fulfil the purpose for which it was collected, or as required by law, whichever is longer. For example, academic and admission records are typically retained for the duration of a student's enrolment and for a defined period afterward to satisfy record-keeping and reference obligations.

Your information is stored electronically on our servers or those of our service providers, and in some cases in physical files, with reasonable technical and organisational safeguards in place. Where we engage third-party contractors to host or process information on our behalf, we require them to apply equivalent safeguards.

Where we determine retention periods, we consider the nature and sensitivity of the information, the risk of harm from unauthorised access or disclosure, the purpose of processing, and any applicable legal or regulatory retention requirement. Specific retention periods are available on request from our Data Protection Officer.

8. CCTV and Campus Security

We operate CCTV cameras at our campuses for the safety and security of students, staff and visitors, and to protect our property. Footage is monitored and retained for a limited period, after which it is automatically deleted unless it is needed for an investigation, disciplinary matter, or legal proceeding.



Access to CCTV footage is restricted to authorised personnel. We do not use CCTV footage for any purpose other than security and safety unless required by law or requested by a competent authority.

9. Online Fee Payments

Where you make school fee or other payments through our website or portal, we (or our payment processor acting on our behalf) collect the payment details necessary to process the transaction, such as card or mobile money details and transaction references.

Payment card details are processed through PCI-DSS compliant payment processors and are not stored on our own servers beyond what is necessary to reconcile and confirm the transaction. We retain records of the transaction (amount, date, payer) for accounting and statutory purposes.

10. Student and Parent Portal

Our student and parent portal gives you access to information such as academic performance, attendance, fee statements, and communications from the school. Access to the portal is protected by login credentials, and you are responsible for keeping these confidential.

Information displayed on the portal is drawn from the categories of Personal Information described in Section 2 and is used strictly for the purposes of supporting your (or your child's) education and your relationship with Granada School.

11. School Transport Tracking

Where your child uses our school transport service, we may collect location data relating to the school bus in order to provide pick-up and drop-off updates, monitor routes, and ensure student safety while in transit.

This location data is used solely for transport-management and safety purposes and is retained only for as long as necessary for these purposes, or as required by law.



12. Quality and Protection of Your Information

We take reasonable steps to keep the Personal Information we hold accurate, complete and up to date. Please help us do this by informing us promptly of any change to your details, via info@granadainternationalschools.com

We apply reasonable technical and organisational measures to protect Personal Information against loss, unauthorised access, alteration or disclosure. However, no system is completely secure, and we cannot guarantee absolute security of information transmitted over the internet. In the event of a data breach affecting your Personal Information, we will notify you and the Office of the Data Protection Commissioner as required by law.

13. How We Use Cookies

Our website may use cookies – small files placed on your device – to distinguish you from other users, remember your preferences, and help us understand how our website is used so that we can improve it. You can control or disable cookies through your browser settings, though doing so may affect certain website features.

14. Access to Information

You have a right to request access to information Granada School holds about you under Kenya's Access to Information Act, 2016 and the Data Protection Act, 2019. To make such a request, please contact us using the details in Section 21.

15. Your Rights

Under the Data Protection Act, you have the right to:

- **Access** – request a copy of the Personal Information we hold about you.
- **Correction** – ask us to correct inaccurate or incomplete Personal Information.
- **Erasure** – ask us to delete Personal Information where there is no lawful basis for us to continue holding it.



- 
- **Withdraw consent** – where we rely on your consent to process your information, withdraw it at any time (this does not affect processing carried out before withdrawal).
 - **Object** – object to our processing of your Personal Information on legitimate grounds; where we have no overriding lawful basis to continue, we will stop.

To exercise any of these rights, please contact us using the details in Section 21. We may need to verify your identity before acting on a request, and we will respond within the timeframes required by law.

16. Direct Marketing

We may occasionally send you information about Granada School's programmes, events, or news. You may opt out of marketing communications at any time by using the unsubscribe option in the communication itself, or by contacting us directly. You will continue to receive communications that are not marketing-related, such as those necessary for your child's education.

17. Children's Personal Information

As a school, much of the Personal Information we process relates to minors. We collect and process children's Personal Information only where necessary for their education, safety and wellbeing, or where a parent or legal guardian has consented on their behalf. Parents and guardians may exercise the rights described in Section 15 on behalf of their child.

18. Consumer Protection Act and Data Protection Act Compliance

Nothing in this Notice is intended to limit or exclude any right or protection you have under the Consumer Protection Act, No. 46 of 2012, or the Data Protection Act, No. 24 of 2019, to the extent that the law does not permit such limitation or exclusion. This Notice will always be interpreted in a manner consistent with those Acts.



GRANADA GROUP OF SCHOOLS LIMITED

Postal Address: P.O. Box 20 - 80119, Vipingo, Kenya

Street Address: Off Mombasa-Malindi highway

Tel: +254 772 003 003 | +254 786 003 003

Email: info@granadainternationalschools.com

Reg No: PVT-6Y1ZMLV3 | KRA PIN: P052523310N

19. Governing Law

This Privacy Notice is governed by the laws of Kenya. If any provision of this Notice is found unenforceable, the remaining provisions will continue in full force and effect.

20. Changes to This Notice

We may update this Privacy Notice from time to time. Any changes will be posted on this page with an updated effective date. We encourage you to review this Notice periodically.

21. Contact Us

For any questions, concerns, or requests relating to this Privacy Notice or your Personal Information, please contact us on:

info@granadainternationalschools.com

