MERIDIAN SCHOOL
Connecting the Mind and Heart

DATA PRIVACY POLICY, PROCEDURES & STANDARD OPERATING PROCEDURES (SOPs) FOR PROTECTING CHILDREN'S DATA

1. POLICY STATEMENT

Meridian School is committed to protecting the privacy, confidentiality, and security of personal data belonging to students and their parents/guardians. In accordance with the **Digital Personal Data Protection Act, 2023 (DPDPA)**, the school recognizes that children are a vulnerable group and therefore accords **the highest level of protection** to children's personal data.

Meridian School shall ensure that all personal data is:

- Collected lawfully and transparently
- Used only for legitimate educational purposes
- Protected against unauthorized access, misuse, loss, or disclosure

2. OBJECTIVES

This policy aims to:

- Ensure **lawful, fair, and transparent** processing of personal data
- Protect children's data from breaches, misuse, or unauthorized access
- Empower parents/guardians with **clear rights and control** over their child's data
- Establish **clear procedures and SOPs** for staff and service providers
- Ensure institutional compliance with **DPDPA, 2023**

3. SCOPE

This policy applies to:

- **Student data** (all students below 18 years of age)
- **Parent / Guardian data** collected for school operations
- **All staff**, including teaching, administrative, contractual, and temporary staff
- **Third-party service providers** (EdTech platforms, transport, ERP systems, exam boards, etc.) who process data on behalf of the school

4. CATEGORIES OF DATA COLLECTED

4.1 Student Data

- Personal details: Name, date of birth, address, Aadhaar (where legally required)
- Academic records: Assessments, reports, attendance
- Health information: Medical conditions, allergies, emergency details
- Visual data: Photographs, videos, CCTV footage
- Digital data: LMS usage, school email IDs, online submissions

4.2 Parent / Guardian Data

- Name and contact details
- Identification details (where required)
- Financial information related to fees and payments

4.3 Digital & System Data

- Login records
- Communication records through official platforms
- Usage data from school-approved applications

5. CONSENT & RIGHTS OF DATA PRINCIPLES

5.1 Consent

- **Explicit and verifiable parental consent** is mandatory before collecting or processing any child's personal data.
- Consent shall be obtained through **written or secure digital consent forms**.
- Parents may **withdraw consent at any time**, subject to legal and operational requirements.

5.2 Rights of Parents and Students

Parents and eligible students have the right to:

- Access personal data held by the school
- Request correction or updating of inaccurate data
- Request deletion of data when it is no longer required for lawful purposes
- Object to non-essential processing
- Seek grievance redressal

Requests shall be acknowledged and addressed within timelines prescribed under DPDPA.

6. DATA PROTECTION PRINCIPLES & PROCEDURES

6.1 Data Minimization

- Only data **necessary for educational, safety, or regulatory purposes** shall be collected.

6.2 Secure Storage

- Digital data shall be stored in **encrypted, password-protected systems**.
- Physical records shall be stored in **locked cabinets with controlled access**.

6.3 Access Control

- Access to personal data shall be strictly **role-based**.
- Staff access shall be limited to what is required to perform assigned duties.

6.4 Data Retention

- Student data shall be retained **only for the duration of enrolment plus the legally required retention period**.
- Data no longer required shall be securely deleted.

6.5 Data Sharing

- Data shall be shared **only when legally required** or with:
  - Government authorities
  - Examination boards
  - Authorized service providers
- All third parties must sign **Data Processing & Confidentiality Agreements**.

7. STANDARD OPERATING PROCEDURES (SOPs)

SOP 1: Data Collection

- Obtain documented parental consent prior to data collection.
- Verify identity of the parent/guardian providing consent.
- Collect only mandatory and relevant data fields.
- Avoid collection of sensitive data unless legally or operationally necessary.

SOP 2: Data Storage & Security

- Store digital data on secure, encrypted servers.
- Restrict system access using strong authentication mechanisms.
- Secure physical files in locked storage.
- Conduct **annual cybersecurity and data security audits**.

SOP 3: Data Access & Usage

- Implement role-based access controls.
- Maintain access logs recording:
  - User
  - Date & time
  - Purpose of access
- Strictly prohibit:
  - Profiling of children
  - Use of data for marketing or advertising
  - Use beyond educational and administrative purposes

SOP 4: Data Retention & Deletion

- Archive student records after graduation or exit.
- Securely delete data after the approved retention period.
- Maintain deletion records for audit and compliance purposes.

SOP 5: Data Breach Management

In the event of a data breach:

- Immediately contain and assess the breach.
- Notify the **Data Protection Board of India** within prescribed timelines.
- Inform affected parents/guardians promptly.
- Conduct root-cause analysis and implement corrective actions.
- Document the incident and response actions.

SOP 6: Training & Awareness

- Conduct **mandatory annual training** for staff on data protection and privacy.
- Organize awareness sessions for parents on:
  - Data rights
  - Safe digital practices
- Display reminders and guidelines on safe data handling within the school.

8. ACCOUNTABILITY & GOVERNANCE

- Appoint a **Data Protection Officer (DPO)** responsible for:
  - Monitoring compliance
  - Handling grievances
  - Coordinating audits and breach responses
- Maintain:
  - Compliance records
  - Consent logs
  - Audit trails
- Conduct **Data Protection Impact Assessments (DPIA)** before onboarding new digital tools or platforms.

9. POLICY REVIEW & COMMUNICATION

- This policy shall be **reviewed annually** or earlier if required by changes in law or technology.
- Updates shall be communicated to:
  - Parents/guardians
  - Staff
  - Relevant stakeholders

Meridian School affirms its commitment to creating a safe, trustworthy, and legally compliant digital environment for every child.