

# Hillcrest Schools Privacy Notice

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## 1. Introduction

Hillcrest Schools is committed to protecting the privacy and security of your personal information in line with the Zimbabwe Cyber and Data Protection Act [Chapter 12:07]. As an institution built on integrity, wellbeing, and responsible stewardship, we handle personal information with care, transparency, and respect. All employees and external service providers who support our information systems must follow the data-protection principles and measures set out in this notice. Protecting personal information is an important part of Hillcrest's broader commitment to safeguarding the wellbeing of students and creating a safe learning environment.

## 2. What is Personal Information?

Personal information is broadly defined as any information relating to an identified or identifiable living individual. Examples of personal information we may collect and process include, but are not limited to:

- a.) **Personal Identifiers:** Name, address, and contact details (telephone number, email address) of students and parents/guardians
- b.) **Demographic Data:** Age, sex/gender, marital status, family status, race, national or ethnic origin, colour, religious or political beliefs or association
- c.) **Identifying numbers or symbols:** National ID number, driver's license number
- d.) **History:** Educational, financial, or healthcare history (including disabilities)
- e.) **Online Identifiers:** IP addresses, location data, and device information (may be collected when you use our website or interact with us online)
- f.) **Educational and Application Specific Data:** Educational history, previous school reports, student achievements, and documents submitted for enrollment

## 3. What Personal Information Do We Collect?

In the course of providing our educational services, we collect personal information directly from students, parents, guardians, and staff, which may include:

- a.) Full names, email addresses, phone numbers, and physical addresses
- b.) Educational background, skills, and qualifications
- c.) Demographic information like age and gender
- d.) Information collected when you interact with us online or use our website (such as our online "arrange-a-visit" forms or the School Portal), including technical data like IP address, browser type, and device information
- e.) Information from social media platforms if you interact with our pages or posts

### 3.1 Sensitive information

Hillcrest Schools may process sensitive personal information such as health records, disability information, religious or cultural details, and other categories defined as sensitive under the Cyber and Data Protection Act. This information is handled with **enhanced protection**, meaning:

- a.) It is processed only when strictly necessary for educational, safeguarding, legal, or operational purposes
- b.) Access is limited to authorised staff
- c.) Strong security and confidentiality controls are applied
- d.) Third-party processors must comply with strict data protection obligations
- e.) Sensitive information is never used for unrelated purposes and is retained only for as long as required.

## **3.2 Minors Data**

Hillcrest Schools processes the personal information of minors with enhanced care and in accordance with the Cyber and Data Protection Act.

### **3.2.1 Parental or Guardian Consent:**

For pupils who are minors, consent is obtained from parents or legal guardians for processing activities that require consent, including the use of identifiable photographs, videos, and audio recordings. Consent may be withdrawn at any time by submitting a written request to the Data Protection Office, subject to legal and operational limitations.

### **3.2.2 Safeguards for Minors:**

We apply additional protections when handling children's data, including limiting access to authorised staff, ensuring secure storage, and requiring third-party service providers to comply with strict data protection obligations. Media content is used responsibly and in a manner that respects the dignity, privacy, and safety of students.

### **3.2.3 Exercising Rights on Behalf of Children:**

Parents or legal guardians may exercise a child's data protection rights, including access, correction, objection, and erasure. Proof of identity and guardianship may be required.

### **3.2.4 Age-Appropriate Communication:**

Where appropriate, Hillcrest provides pupils with simplified, age-appropriate explanations about how their information is used and guidance on safe use of digital platforms.

## **4. How We Use Your Personal Information (Purposes of Processing)**

Hillcrest Schools processes personal information only for lawful, educational, administrative, and operational purposes, including:

- a.) Processing applications and enrolment for Hillcrest Preparatory and Hillcrest College
- b.) Delivering educational services, academic support, and career guidance

- c.) Managing the Hillcrest School Portals (Prep and College), including communication with parents through newsletters, calendars, and event updates
- d.) Managing billing, fees, and financial obligations
- e.) Facilitating participation in school, national, and international events
- f.) Complying with legal and regulatory requirements

## 4.1 Image Use, Media, and Marketing:

Hillcrest Schools may collect and use photographs, video recordings, audio recordings, and livestream content during educational, sporting, cultural, religious, and administrative activities. These may be used for educational purposes, student records, security monitoring, school publications, newsletters, social media, marketing materials, the school website, and livestreaming or virtual events.

As Hillcrest primarily serves minors, identifiable media content is used only with parent or guardian consent, obtained during enrolment or through event-specific consent. Parents may object or withdraw consent in writing, subject to legal and operational limitations. Media is used responsibly and in a manner that respects the dignity and safety of students and staff.

## 4.2 Parent vs Student Portal Access:

Parents and guardians access the Parent Portal for communication, billing, academic updates, and administrative information. Students access the Student Portal for learning resources, assignments, and academic tools. Each user group receives access only to the information relevant to their role.

## 4.3 CCTV and Security Monitoring:

CCTV is used on school premises for safety, security, and operational purposes. CCTV footage is processed in accordance with applicable laws. Clear signage is provided on campus to indicate where CCTV is in operation. CCTV is not used for continuous monitoring of teaching or learning activities, except where required for safety or incident investigation.

# 5. Lawful Basis for Processing

Hillcrest Schools processes personal information in accordance with the Zimbabwe Cyber and Data Protection Act. We rely on different lawful bases depending on the nature of the processing and the relationship we have with students, parents, guardians, and staff.

Our processing activities are based on one or more of the following:

- a.) **Consent:** We rely on consent only where the processing is optional or not strictly necessary for educational or legal purposes. This includes the use of pupil images, marketing communications, and participation in certain optional activities. You may withdraw your consent at any time.
- b.) **Contract:** We process personal information where it is necessary to enter into or perform our contract with you, including enrollment, fee administration, provision of

educational services, communication regarding academic progress, and access to the School Portals.

- c.) **Legitimate Interests:** We process personal information for **the school's** legitimate educational and operational interests, provided these do not override your rights and freedoms. Examples include campus security, CCTV monitoring, internal analytics, and improving our services.
- d.) **Vital Interest:** We may process or share personal information where it is necessary to protect the life, health, or physical safety of a student, staff member, or any individual on our premises. This includes medical emergencies, safeguarding concerns, or situations requiring urgent intervention.
- e.) **Public Interest:** As an educational institution, certain processing activities are carried out in the public interest or in the exercise of our **statutory** educational mandate. This includes maintaining academic records, ensuring student wellbeing, participating in national assessments, and fulfilling governance and oversight requirements.

## 6. Who We Share Your Personal Information With.

We may share your personal information only where necessary and in line with the Cyber and Data Protection Act. Recipients include:

- a. **Teachers, administration, and authorised school personnel** who require the information to support learning, manage school operations, or ensure student wellbeing.
- b. **Third-party service providers** who support our systems and services, such as hosting the School Portal, managing application platforms, or providing educational tools. These providers may only process personal information **under binding data protection agreements**, which require them to keep the information secure, confidential, and used solely for the services they provide to Hillcrest Schools.
- c. **Educational boards, legal authorities, or regulatory bodies** where disclosure is required by law or necessary to meet statutory obligations.

*Hillcrest Schools does not sell or share personal information for commercial purposes.*

## 7. Transfer of Personal Information Outside Zimbabwe

- a.) Some of our systems and service providers may store or process personal information outside Zimbabwe (for example, for secure hosting or backup services). When this occurs, Hillcrest Schools ensures that:
  - b.) Transfers comply with the Cyber and Data Protection Act and its regulations
  - c.) Your personal information is protected through appropriate safeguards, such as data processing agreements or standard contractual clauses , secure transfer mechanisms, and strict confidentiality obligations
  - d.) Third-party providers meet security and privacy standards equivalent to those required in Zimbabwe
  - e.) We only transfer personal information where it is necessary and where adequate protection is guaranteed.

## 8. Your Rights As a data subject

The school upholds the rights of all data subjects regarding your personal information. We also encourage parents, guardians and all data subjects to reach out to the School DPO for any data protection concerns. These rights include:

- a.) **Right to be Informed:** You have the right to be informed about the collection and use of your personal information
- b.) **Right to Access:** You have the right to request access to your personal information that we hold or request your data in a machine-readable format.
- c.) **Right to Rectification:** You have the right to request that we correct any inaccurate or incomplete personal information we hold about you.
- d.) **Right to Erasure (Right to be Forgotten):** You have the right to request the deletion of your personal information under certain circumstances
- e.) **Right to Restriction of Processing:** You may restrict processing, object to processing, or revoke your consent in writing at any time.
- f.) **Rights Related to Automated Decision-Making:** You have the right not to be subject to a decision based solely on automated processing

### 8.1 How to Exercise Your Rights To exercise any of your rights

Please contact us using the details provided below in Section 12. We may require you to provide proof of your identity before we can respond to your request. We will respond to requests regarding your rights within 30 days

### 8.2 The Role Of The Regulator

The **Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ)** is the designated **Data Protection Authority** responsible for overseeing and enforcing compliance with the Cyber and Data Protection Act.

**POTRAZ's responsibilities include:**

- a.) Regulating and supervising how organisations process personal information
- b.) Investigating complaints related to data protection violations
- c.) Ensuring that data controllers and processors comply with the Act
- d.) Issuing guidelines, directives, and enforcement actions where necessary

If you believe that Hillcrest Schools has not handled your personal information in accordance with the law, you have the right to lodge a complaint directly with POTRAZ.

## 9. Data Security

Hillcrest Schools protects personal information through a combination of technical and organisational measures (TOMs).

### **a.) Access Controls:**

Only authorised staff can access personal information, and access is limited to what they need for their duties.

### **b.) Staff Responsibilities:**

Employees and service providers must handle information confidentially, follow school data-protection procedures, and use data only for legitimate school purposes.

### **c.) Technical & Organisational Measures (TOMs):**

We use secure systems, encrypted platforms, protected networks, regular backups, and ongoing monitoring to maintain the security, integrity, and availability of personal information.

### **d.) Secure Use of Devices & Portals:**

School devices and online portals are protected through authentication and secure configurations, and personal information accessed through them must be handled responsibly to prevent unauthorized disclosure.

### **e.) Security Awareness Training:**

Hillcrest Schools provides ongoing security awareness training to staff to ensure they understand their responsibilities and follow best practices when handling personal information.

*Hillcrest Schools continuously reviews and strengthens its security measures to ensure personal information remains protected.*

## **9.1 Data Breach Response**

Hillcrest Schools is committed to transparency and protecting your information. If a data breach occurs that may affect you or your child, we will act quickly to investigate, contain the issue, and reduce any potential harm.

In line with the Cyber and Data Protection Act and its regulations:

- a.) We will notify the Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ) **within 24 hours** of becoming aware of a breach. All staff members immediately report breach to the DPO as per our data breach response procedures.
- b.) If the breach is likely to pose a high risk to your rights or your child's rights, we will also inform affected individuals **within 72 hours**.
- c.) After investigating the incident, we will submit a full report to POTRAZ **within 21 days**.
- d.) We will provide clear information about what happened and the steps we are taking to prevent a similar incident in future.

## 10. Data Retention

Hillcrest Schools keeps personal information only for as long as it is needed for educational, administrative, legal, or regulatory purposes. Different categories of information are retained for different periods, depending on statutory requirements and the nature of the record.

- a.) **Academic Records:** Retained for the period required by education regulations and for long-term academic reference.
- b.) **Financial Records:** Retained in line with accounting, audit, and tax requirements.
- c.) **Disciplinary Records:** Kept only for as long as necessary to manage the matter and meet legal or safeguarding obligations.
- d.) **CCTV Footage:** Retained for short periods unless required for security, investigation, or legal purposes.
- e.) **Administrative Documents:** Retained according to operational needs and applicable regulatory timelines.
- f.) Once records are no longer required, they are securely archived or permanently destroyed in accordance with legal and regulatory requirements.

## 11. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our practices or legal requirements. We will notify you of any material changes by posting the updated notice on our website

## 12.DPO Contacts

If you have any questions, concerns, or requests regarding this Privacy Notice or our data protection practices, please contact our data protection office: **DPO Email:**  
**dpo@hillcrestschools.co.zw**

*Disclaimer: This Privacy Notice is intended to provide general information about how we handle personal information.*

*It is not a substitute for legal advice and may be updated as required by law or operational needs*