

INFORMATION ON DATA PROCESSING IN CONNECTION WITH THE PUBLICATION OF IMAGE

Pursuant to Article 13(1)–(2) of the General Data Protection Regulation (GDPR)ⁱ, we inform you that:

1. The controller of your personal data is the **International School of Gdansk**. You may contact us by post at: ul. Biała 1, 80-435 Gdańsk; by email at: isg@gfo.pl; or by phone: +48 58 342 31 00.
2. The correctness of personal data processing is supervised by the **Data Protection Officer**, who can be contacted via email at iod@gfo.pl or by post at the school's address.
3. The subject of data processing is your **image** recorded during school activities (educational, care, or upbringing-related), as well as during participation in school programs, projects, field trips, competitions, and events. The image will be processed (published) on school-managed websites (www.isg.gfo.pl, www.ipg.gfo.pl, www.eisg.gfo.pl, www.hisg.gfo.pl) and social media platforms (in particular: www.facebook.com/InternationalSchoolOfGdansk, www.facebook.com/InternationalPreschoolOfGdansk, www.instagram.com/isg_official, www.instagram.com/ipg_gdansk), as well as in promotional materials in the press and online media, and in other forms of documenting school activities (e.g. school newsletter, posters, brochures, chronicles, bulletin boards).
4. Your data will be processed for purposes related to **sharing information about the statutory activities of the school** (educational, care, upbringing, and promotional). These purposes include, in particular: promoting health, safety, social, artistic and sporting activity, healthy competition, school identity, personal culture, responsibility, care for others, and recognizing and communicating successes and achievements.
5. The legal basis for processing (publishing) your image is **Article 81 of the Copyright and Related Rights Act**, in connection with:
 - **Article 6(1)(a) GDPR** – based on your consent;
 - **Article 6(1)(e) GDPR** – based on the performance of a task carried out in the public interest or in the exercise of official authority vested in the school;
 - **Article 6(1)(f) GDPR** – based on the legitimate interests pursued by the school.
6. The publication of an image of a person who appears only as an element of a larger whole (e.g. landscape, sports event, school event) does not require consent. If the image is only a small, non-central part of a larger photograph or scene, and its removal would not alter the subject or nature of the photo, then—under current law—no consent is required. Likewise, no consent is required for publishing the image of a publicly known person if the image was taken in relation to their public function.
7. Photographs may be digitally edited, cropped, or composed, but never in a way that would violate the personal rights of the student.
8. Data will be processed for the time necessary to fulfill the purpose for which it was collected, or until consent is withdrawn (if processing is based on consent). Please note that withdrawal of consent is not retroactive—processing prior to withdrawal remains lawful. When requesting changes regarding the processing of your data, please clearly indicate which images, videos, or content the changes refer to.
9. Recipients of your data may include entities to whom the personal data has been disclosed—excluding public authorities, which may receive the data only in the context of specific administrative proceedings. Recipients may also include entities supporting the school in fulfilling its statutory duties, particularly in the area of IT services.
10. Your data will not be transferred to a third country or an international organization.
11. In accordance with the GDPR, you have the right to:
 - access your data and receive a copy thereof;
 - rectify (correct) your data if it is inaccurate or outdated, and erase it when processing is not required for legal compliance or public tasks;
 - restrict or object to the processing of your data;
 - lodge a complaint with the **President of the Personal Data Protection Office** (ul. Stawki 2, 00-193 Warsaw);

- withdraw your consent to data processing, if the data was processed based on your consent; withdrawal of consent does not affect the lawfulness of data processing carried out prior to withdrawal.

12. Your data will not be used for automated decision-making or profiling.

ⁱ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (OJ L 119, 4.5.2016, p. 1; OJ L 127, 23.5.2018, p. 2)