Records Maintenance Policy

1. Student records are kept on SharePoint and in the EC database, Konnect. Academic records are also kept in EC Online (EC's learning management system) which is where students take their placement and progress assessments. Only EC staff can access these files on Sharepoint and Konnect and make edits and updates as needed. Each student gets a unique login at the time of booking for EC Online, however, and can use this system to view attendance, academic progress, and other basic school information. We do not give personal information out over the phone and students cannot edit EC Online. Access to information in student files is only granted to the student (or the guardian if student is under 18 years old) upon request.

Once a student is enrolled, student records are updated in Konnect and files for the students are created on Sharepoint. Student intake documents, attendance warning letters and the like are kept in the Sharepoint files for easy access to information as the Konnect system does not have the capability of uploading documents. Basic enrollment details, product information and financial tracking for the student are all held in Konnect. Each EC employee has a designated personal password to log into the Konnect system and passwords are not shared between employees. Depending on your position within EC you may have various levels of access.

All student files are kept on Sharepoint and are stored on the cloud and can be accessed by EC staff at any time.

Additionally, EC publishes a global privacy policy on our website which explains confidentiality of any student details collected online. See the details in our published Privacy Policy attached. EC's privacy policy is also posted online and can be found here: https://www.ecenglish.com/en/privacy-policy

Any personnel records for school staff and faculty are kept in a locked cabinet in the Center Director (full time operational/administrative staff) or Director of Studies (faculty) offices. EC uses Bamboo for HR management and in Q1 2022 files were transitioned to Bamboo for secure and efficient management.

2. A) Admissions

Admissions information, including visa information (application forms for walk-in students, student visa information, financial certifications, insurance documentation, etc.) are kept digitally, in addition to the basic student data, which is entered into our database program, Konnect.

Housing information (homestay and apartment data, correspondence, confirmations, regulations, etc.) is also kept in electronic format and can also be found in Konnect.

For each student, EC collects copies of the following documents:

- Passport information page
- Visa stamp page in the passport (upon arrival)
- Copy of Proof of Insurance (upon arrival)
- Enrollment and Waiver form as applicable per location (upon arrival), PTIB contract for BC

B) Students Accounts

Student financial accounts are maintained in EC's proprietary database Konnect and kept in electronic files. Invoices are processed in electronic form through Konnect but may infrequently be kept in hard Proof of payment made locally at the school by credit/debit card is maintained in hard copy in a receipts binder. Student invoices and statements can be found in Konnect.

C) Grades and Transcripts

Placement tests and progress assessments are kept in EC Online along with student placement test information merged with the student database Konnect to ensure placement of a student in an appropriate level.

D) Attendance

Attendance records are kept online in EC Online and teachers are required to enter attendance into the system by the end of the day. If the teacher is a substitute who does not have access to the class visa EC Online, the Director of Studies or class teacher may enter the attendance in their place.

E) Counseling

Student counselling and evaluations are kept in electronic format, in the student files and feedback from the Arrival, Touchpoint and Relationship surveys are kept in CheckMarket as applicable. Academic tutorials and study plans are kept in EC Online.

3.

- **Data stored in Konnect**

The data in our corporate booking system, Konnect, is all stored on the Microsoft Azure cloud and is covered by Microsoft's DPA (Data processing agreement). This is also fully backed up on the same Microsoft cloud and includes all components (WebApps/Virtual Machines/SQL). We have constant access to this data and support directly with Microsoft.

- **Files Stored on the company's servers**

The absolute majority of the company's and end-user's data is stored securely on the Microsoft Cloud via Office365. The main repositories are Teams, SharePoint, and OneDrive. This data is not backed up. We also have marketing data that is hosted on a local server at EC Malta, and this is in turn backed up on premises.

- **E-Mail**

Our E-Mail system is completely hosted by Microsoft via Office365. The live data is not backed up. Archived mailboxes are stored in SharePoint, local NAS devices in Malta, London, and US.

4. Enrolled student records are updated in EC Online and the Konnect database for easy access to information. Enrollment data is also tracked in the accounting system for financial reporting, managerial accounting, and data analysis. Any paper student records are kept for five years, however electronic files can be accessed at any time.